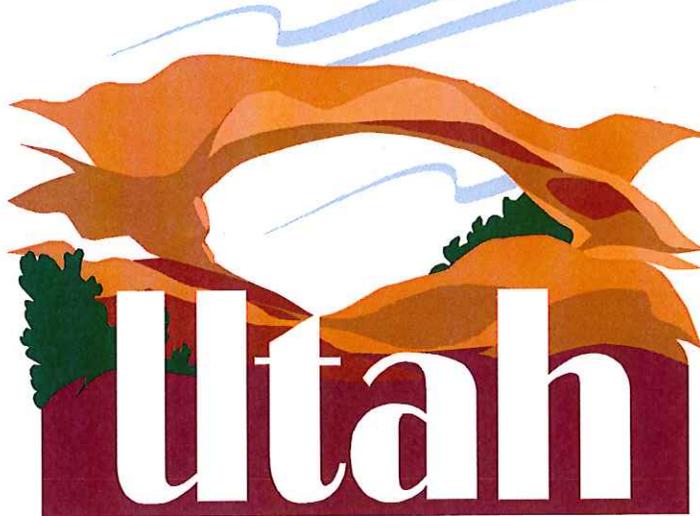


*State of Utah  
Community Services Block Grant Program*

***CSBG STATE PLAN & APPLICATION  
Federal Fiscal Years 2015 & 2016***



**Prepared by**

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State Community Services Office  
Housing and Community Development Division  
Department of Workforce Services**

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## **I. Federal Fiscal Year(s) of CSBG State Plan**

FFY 2015 and FFY 2016

## **II. Letter of Transmittal**

Please see cover letter.

## **III. Executive Summary**

### **A. CSBG State Legislation**

This document has been prepared by the State Community Services Office, Housing and Community Development Division, of Utah's Department of Workforce Services. The State Community Services Office is the agency designated to administer the Community Services Block Grant and has the specific charge of daily operations of the CSBG program, including the development of the State plan to be submitted to the Secretary under subsection (b). This Management Plan delineates the manner in which funds will be expended and how the Federal assurances will be met by the State of Utah during the Federal fiscal years (FFY) 2015 and 2016. This Plan is submitted to the Federal Government after a period of public review, comment, and a public hearing, in addition to a Legislative Hearing conducted by the Utah State Legislature where the public and grantees have had an opportunity to comment.

### **B. Designation of Lead State Agency to Administer the CSBG Program**

The State Community Services Office (SCSO) in the Housing and Community Development Division (HCDD), Department of Workforce Services (DWS), will administer the CSBG program. (See Letter of Designation—Attachment I)

Refer to Attachment II for the entire text of the Utah Statutes regarding CSBG. The State statute can be found on-line at: [http://le.utah.gov/code/TITLE35A/htm/35A08\\_100500.htm](http://le.utah.gov/code/TITLE35A/htm/35A08_100500.htm)

### **C. Agency and Contact Information:**

- 1) **State Designee:** State Community Services Office, Housing and Community Development Division, Department of Workforce Services, State of Utah
- 2) **Department Director:** Jon Pierpont, Executive Director, Department of Workforce Services
- 3) **Division Director and Official to receive CSBG Award:** Gordon D. Walker, Director, Housing and Community Development Division e-mail: [gdwalker@utah.gov](mailto:gdwalker@utah.gov)
- 4) **CSBG State Director to receive notification of award:**  
Tamera Kohler, Director, State Community Services Office, [tkohler@utah.gov](mailto:tkohler@utah.gov)
- 5) **State Contact Person:** Tamera Kohler, Director, State Community Services Office, Housing and Community Development Division, Department of Workforce Services, 1385 South State Street, 4<sup>th</sup> Floor, Salt Lake City, Utah 84115 e-mail: [tkohler@utah.gov](mailto:tkohler@utah.gov)
- 6) **State Contact phone:** (801) 468-0148
- 7) **State Contact fax:** (801) 468-0211
- 8) **State Fiscal Manager:** Kimberley Schmeling, Fiscal Officer, Department of Workforce Services, 140 East 300 South, 5<sup>th</sup> Floor, Salt Lake City, UT 84111 e-mail: [kschmeling@utah.gov](mailto:kschmeling@utah.gov)
- 9) **EIN:** 87-6000545
- 10) **OMB Control Number:** 0970-0382      **Expiration Date:** 08/31/2016

### **D. Public Hearing Requirements**

- 1) **Public Hearing:** The State Community Services Office published the Notice of Public Comment on July 18, 2014. The public hearing was held July 25, 2014, in Salt Lake City.

Interested parties were notified that copies of the CSBG plan were available by visiting the SCSO's website, <http://housing.utah.gov/scso/csbg>. Written comments were accepted until August 8, 2014. (See Attachment III for Notice of Public Comment.)

2) **Legislative Hearing:** A legislative hearing was held on September 18, 2013, in Salt Lake City at the State Capitol. (See Attachment IV for the Minutes of said hearing.)

3) **Public Inspection of State Plan:**

Copies of the State Plan were made available by visiting the website of the State Community Services Office at <http://housing.utah.gov/scso/csbg>. In addition, a copy of the plan was distributed to the following locations statewide:

- Department of Workforce Services in Salt Lake City
- Bear River Association of Governments in Logan
- Ogden Weber Community Action Partnership in Ogden
- Family Connection Center in Clearfield
- Salt Lake Community Action Program in Salt Lake City
- Community Action Services and Food Bank in Provo
- Six County Association of Governments in Richfield
- Five County Association of Governments in St. George
- Uintah Basin Association of Governments in Roosevelt
- Southeastern Utah Association of Local Governments in Price
- Utahns Against Hunger in Salt Lake City
- Community Action Partnership of Utah in Salt Lake City

#### **IV. Statement of Federal and CSBG Assurances**

As part of the annual or biannual application and plan required by Section 676 of the Community Services Block Grant Act, as amended, (42 U.S. C. 9901 et seq.) (The Act), the designee of the chief executive of the State, the Housing and Community Development Division of Utah's Department of Workforce Services, hereby agrees to the programmatic and administrative assurances in Section 676 of the Act.

**A. Programmatic Assurances:**

1) Funds made available through this grant or allotment will be used:

- a) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families, and to enable the families and individuals to:
- i. remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
  - ii. secure and retain meaningful employment;
  - iii. attain an adequate education, with particular attention toward improving literacy skills of the low-income families in the communities involved, which may include carrying out family literacy initiatives;
  - iv. make better use of available income;
  - v. obtain and maintain adequate housing and a suitable living environment;
  - vi. obtain emergency assistance through loans, grants, or other means to meet



supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals; [676(b)(4)]

- 5) That the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and a description of how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 101 of such Act, in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998; [676(b)(5)]
- 6) That the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such community; [676(b)(6)]
- 7) That the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D of the Act; [676(b)(7)]
- 8) That any eligible entity in the State that received funding in the previous fiscal year through community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b) of the Act; [676(b)(8)]
- 9) That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations; [676(b)(9)]
- 10) That the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation; [676(b)(10)]
- 11) That the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs; [676(b)(11)]
- 12) That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b) of the Act, or an alternative system for measuring performance and results that meets the requirements of that section, and a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and

community revitalization; [676(b)(12)]

- 13) That the State will provide information describing how the State will carry out the assurances described in this subsection. [676(b)(13)]

**B. Administrative Assurances**

The State further agrees to the following, as required under the Act:

- 1) To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the community services block grant program prepared in accordance with, and containing the information described in, Section 676 of the Act. [675A(b)]
- 2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the community services block grant program and to make such funds available to eligible entities for obligation during the fiscal year and succeeding fiscal year, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. [675C(a)(1) and (2)]
- 3) In the event that the State elects to recapture and redistribute funds distributed to an eligible entity through a grant made under Section 675C(a)(1) when unobligated funds exceed 20 percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the community services block grant program. [675C(a)(3)(A) and (B)]
- 4) To spend no more than the greater of \$55,000 or 5 percent of its grant received under Section 675A or the State allotment received under Section 675B for administrative expenses, including monitoring activities. [675C(b)(2)]
- 5) In states with a charity tax credit in effect under State law, the State agrees to comply with the requirements and limitations specified in Section 675(c) regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. [675(c)]
- 6) That the State Community Services Office, the designated lead agency, will prepare and submit to the Secretary an application and State plan covering a period of not less than one and no more than two fiscal years, and shall submit such plan not later than 30 days prior to the beginning of the first fiscal year covered by the plan as required in section 676(b), and will hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or 675B for the period covered by the State plan. [676(a)(2)(B)]

- 7) That the chief executive officer of the State will designate, in an application submitted to the Secretary under subsection (b), an appropriate State agency for purposes of carrying out State community services block grant program activities. [676(a)(1)]
- 8) To hold at least one legislative hearing every three years in conjunction with the development of the State plan. [676(a)(3)]
- 9) That the State Community Services Office will make available for public inspection each application and plan or revised State plan prepared under section 676 in such a manner as will facilitate review of, and comment on, the plan. [676(e)(2)]
- 10) That the State Community Services Office will conduct the following reviews of eligible entities:
  - a) Full onsite review of each such entity at least once during each three-year period;
  - b) An onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the community services block grant program;
  - c) Follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State;
  - d) Other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the community services block grant program) terminated for cause. [678B(a)]
- 11) In the event the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan to provide services under the community services block grant program, or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:
  - a) Inform the entity of the deficiency to be corrected;
  - b) Require the entity to correct the deficiency;
  - c) Offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
  - d) At the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved;
  - e) After providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of, or reduce the funding to, the eligible entity unless the entity corrects the deficiency. [678(C)(a)]
- 12) To establish fiscal control and fund accounting procedures necessary to assure the proper disbursement of and accounting for Federal funds paid to the State under this subtitle per section 678D(a)(1) and comply with the audit requirement of section 678D(a)(2) of the Act.
- 13) To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to

which the State is or may become entitled under the Community Services Block Grant program. [678D(a)(3)]

- 14) To participate, by October 1, 2001, and ensure that all-eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System. [678E(a)(1)]
- 15) To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under 678E(a)(2) of the Act, including a summary describing the training and technical assistance offered by the State under section 678C(a)(3) during the year covered by the report.
- 16) To comply with the prohibition against use of community services block grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in Section 678F(a) of the Act.
- 17) To ensure that programs assisted by community services block grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election; or any voter registration activity. [678F(b)(2)(A), (B) and (C)]
- 18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with community services block grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.), or with respect to any otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), or title II of the Americans with Disabilities Act of 1990 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. [678F(c)(1)]
- 19) To ensure that for each fiscal year for which an eligible entity receives a grant under Section 678G, such entity shall:
  - a) Inform custodial parents in single-parent families that participate in programs, activities, or services carried out or provided under this subtitle about the availability of child support services; and refer eligible parents to the child support office of State and local governments.
- 20) To provide an assurance that:
  - a) Religious Organizations Included as Non-governmental Providers  
For any program carried out by the Federal Government, or by the State or local government under this subtitle, the government shall consider, on the same basis as other non-governmental organizations, religious organizations to provide assistance under the program, so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment to the

Constitution. Neither the Federal Government nor a State or local government receiving funds under this subtitle shall discriminate against an organization that provides assistance under, or applies to provide assistance under, this subtitle, on the basis that the organization has a religious character.

b) Religious Character and Independence

- i. In general, a religious organization that provides assistance under a program described in subsection (a) shall retain its religious character and control over the definition, development, practice and expression of its religious beliefs.
- ii. Additional safeguards: Neither the Federal Government nor a State or local government shall require a religious organization—
  - (A) to alter its form of internal governance, except (for the purposes of administration of the community services block grant program) as provided in section 676B; or
  - (B) to remove religious art, icons, scripture or other symbols; in order to be eligible to provide assistance under a program described in subsection (a).
- iii. Employment Practices - A religious organization's exemption provided under sections 702 of the Civil Rights Act of 1964 (42 U.S.C. 2000e-1) regarding employment practices shall not be affected by its participation in, or receipt of funds from program described in subsection(a).

c) Limitations on use of Funds for Certain Purposes

No funds provided directly to a religious organization to provide assistance under any program described in subsection (a) shall be expended for sectarian worship, instruction, or proselytization.

d) Fiscal Accountability

- i. In general—Except as provided in paragraph (2), any religious organization providing assistance under any program described in subsection (a) shall be subject to the same regulations as other nongovernmental organizations to account in accord with generally accepted accounting principles for the use of such funds provided under such programs.
- ii. Limited Audit—Such organizations shall segregate government funds provided under such program into a separate account. Only government funds shall be subject to audit by the government.

e) Treatment of eligible entities and other intermediate organizations—If an eligible entity or other organization (referred to in this subsection as an 'intermediate organization'), acting under a contract, or grant or other agreement, with the Federal Government or a State or local government, is given the authority under the contract or agreement to select nongovernmental organizations to provide assistance under the programs described in subsections (a), the intermediate organizations shall have the same duties under this section as the government.

**C. Other Administrative Certifications**

The State also certifies the following:

- 1) To provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of community services block grant program funds.
- 2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provisions of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan, or loan guarantee. The State further agrees that it will require the language of this certification be included in any sub awards, which contain provisions for children's services and that all sub grantees shall certify accordingly.

SIGNATURE:

\_\_\_\_\_

Gordon D. Walker, Director  
Housing and Community Development Division

\_\_\_\_\_

Date

**V. The Narrative State Plan**

**A. Administrative Structure**

**1) State Administrative Agency**

**a) Mission of the State Community Services Office:**

The State Community Services Office (SCSO) provides guidance, oversight, and funding to help communities assist people to become more self-sufficient socially, physically, culturally, and economically by reducing poverty and improving the quality of life for low-income Utahns. The SCSO coordinates State activities designed to reduce poverty and encourage entities in the private sector to participate in efforts to ameliorate poverty in the community. The SCSO will continue to develop and refine policies and procedures to enhance management goals and standards. Efforts to assist grantees to improve service and program delivery will preserve the flexibility and local initiative of the CSBG.

**Responsibilities of the State Community Services Office:**

The State is responsible for the development and implementation of technical assistance and training as well as consistent monitoring of the overall programmatic and fiscal health of CSBG grantees. The activities of the CSBG staff are varied and comprehensive. They include: monitoring for compliance in program areas; evaluation of grantee service provision; assessment of grantee performance; and the review of three year planning documents and annual work programs to assure appropriateness of proposed activities and compliance with federal assurances and State requirements. Staff prepare and process contracts, reporting documents, and financial statements associated with CSBG programs; develop the annual Management Plan as well as grantee reporting via monitoring, and data collection forms; and collect, compile, and forward data submitted by grantees to Federal partners; and share the prepared annual report with Utah's Governor and Utah's Legislature. Furthermore, staff

organize training and conference activities and provide support to the Community Action Partnership of Utah, the Utah Emergency Food Network, and other community-based organizations, including faith-based organizations. In support of the SCSO staff, the Division provides fiscal and human resource personnel time to CSBG activities.

**b) Goals, Objectives, and Activities of the State Community Services Office:**

- i) Goal I:** The SCSO will administer the CSBG program in Utah in accordance with its mission and in compliance with all applicable statutes, rules, and regulations, in a manner which will increase management efficiency and program effectiveness.

**Objective 1:** The SCSO will allocate and distribute funds in accordance with the CSBG Act (42 U.S.C. 9901 et seq.) and amendments.

**Activities:**

- The distribution allocation will be published each year in the State Plan and Application.
- Public comment on the Plan will be solicited through a public hearing and written comments.
- An application package will be sent to each CSBG grantee prior to the beginning of the Federal fiscal year.
- The planning documents of the application package will be submitted every three years by August 15<sup>th</sup> in the year it is required.
- CAA applications will be submitted every year by August 15<sup>th</sup> to the State. The SCSO will provide technical assistance to local grantees in preparing both the planning documents and work programs.
- Payments will begin upon completion of the administrative review and approval process, full execution of contract documents, and receipt of a request for funds (RFF).
- Program Specialists will make on-site visits and will verify grantee compliance and program progress.
- Pursuant to 42 U.S.C. 9901 et seq., Section 678 (c), the Secretary of DHHS "...shall upon request review any termination or reduction of funding to a community action agency or migrant and seasonal farm worker organization....Such review shall be conducted promptly and shall be based upon the record and no determination shall become effective until a finding by the Secretary confirming the State's finding of cause." Funding to eligible agencies will not be terminated or reduced unless and until a hearing has been granted as set forth in Community Services Block Grant State Rules, R990-100-27.

**Objective 2:** The SCSO will ensure fiscal accountability of CSBG grantees.

**Activities:**

- The SCSO, in partnership with the State Association, will provide fiscal technical assistance throughout FFY 2015.
- The SCSO will monitor each grantee periodically during each program year to review fiscal procedures, confirm data on financial reports, and determine compliance with statutes, contractual obligations, and organizational standards noted in Objective 3.
- Grantees will submit RFFs which detail the expenditure of CSBG funds and

submit an annual audit of books and records within guidelines established in the CSBG Rules.

- Each agency will be subject to an onsite review at least once every three years for program and fiscal compliance.

**Objective 3:** The SCSO will support organizational best practices and strengthen organizational capacity, management efficiency, and program effectiveness of CSBG grantees through a planned process for implementation of all the CSBG Proposed Organizational Standards as set forth by the Office of Community Services' Draft IM (March 24, 2014—See Attachment IX), subject to revision as per OCS guidance.

**Activities:**

- The SCSO has planned a process to implement all of the CSBG proposed standards (as per OCS' Draft IM March 24, 2014—See Attachment IX) as a means to achieve --and measure--best organizational practices for CSBG grantees. The SCSO will work collaboratively with the State Association and CAAs to bring all CSBG grantees into compliance with the proposed standards and expects a ramp-up period during FFY 2015. The SCSO expects 100% compliance by FFY 2016, the first year for reporting on the standards as identified by OCS in the Draft IM (March 24, 2014).
- Create Process and Timeline for Planned Implementation and Technical Assistance:
  - FFY 2014 Activities:
    1. The SCSO initiated discussions with the State Association and CSBG grantees in response to OCS guidance noted in OCS' Draft IM (March 24, 2014): "State CSBG Lead Agencies...should proceed immediately with plans to coordinate with partners in the State on the establishment and implementation of organizational standards."
    2. To this end, the SCSO, in partnership with the State Association, conducted a round table discussion (5/6/14) with partner CAAs on the proposed organizational standards and implementation of those standards.
    3. The State Association tasked each agency (5/6/14) with completing and submitting a self-assessment for meeting the proposed standards (submitted 5/23/14).
    4. Responses were analyzed, aggregated, and shared during a follow-up discussion held during the State Association's board meeting, 5/28/14. The SCSO, the State Association, and the CAAs determined a current compliance rate of nearly 85% with the proposed standards in the aggregated results.
    5. The State Association and the SCSO held a retreat (6/6/14) for planning the training and technical assistance needed to support 100% compliance with the standards by FFY 2016.
    6. The State Association followed-up with the CAAs and shared feedback as the SCSO developed the FFY 2015 and FFY 2016 CSBG State Plan.
    7. The comments, suggestions, questions, and T/TA needs identified

during these collaborative sessions directly shaped the State's FFY 2015 and FFY 2016 CSBG State Plan.

o FFY 2015 Activities:

1. A framework for ongoing discussions to be held during the State Association's bimonthly members' meeting throughout FFY 2015 was established during the planning retreat (6/6/14)
2. CAAs work peer to peer and share best practices and templates through Dropbox. Agencies access templates and will update, as needed, community surveys, fiscal policies, human resource documents, strategic planning and risk assessment tools during FFY 2015.
3. The State Association will conduct monthly one-on-one tracking and training sessions (determined by agencies' self-stated monthly goals) to encourage agencies to stay on track to meeting 100% compliance by FFY 2016 and to provide technical assistance as needed. (See State Association Sample Schedule— Attachment XI).
4. The State Association will provide ROMA and data base training to all CAAs during FFY 2015.
5. The State Association offered to secure an attorney to review by-laws and/or personnel policies for private CAAs with need for attorney review which may be supported by the SCSO through additional discretionary dollars.
6. The SCSO will invite national speakers to present on IS changes and ROMA Next Gen as these updates are rolled out by OCS.
7. The SCSO may also invite other national speakers to train in areas of common challenge for the CAAs as they work toward 100% compliance with the proposed standards.
8. The SCSO and the State Association will include focus on proposed standard compliance in annual conferences (September 2014 and May 2015).
9. The close communication between CAAs, the SCSO, and the State Association, will inform the process for requesting formal implementation through State legislation in FFY 2016.
10. The SCSO, in partnership with the State Association and CAAs, will plan for formal implementation of the proposed standards in FFY 2016 through legislative process.
11. The SCSO will work with Department leadership and legislative liaisons to prepare for presentation to interim legislative committee of proposed organizational standards.

o FFY 2016 Activities:

1. The SCSO will provide all information requested by Department leadership and legislative analysts to facilitate the process of legislative adoption.
2. Pending legislative adoption, the proposed standards will shift from best practice to formal implementation through State statute.
3. The SCSO will monitor and report for compliance with the proposed standards in FFY 2016, as noted in OCS' Draft Matrix

of State and Federal Performance Measures (2/27/14). (See attachment X)

- Create Timeline for Formal Implementation
  - The SCSO will work with Department leadership and legislative analysts to offer a presentation on adoption of the proposed organizational standards to the legislative interim committee (FFY 2015)
  - The SCSO will provide all information requested by legislative analysts to further this process. (FFY 2015 and FFY 2016)
  - The SCSO will hold its CSBG legislative hearing, in conjunction with section 676(a)(3) of the Act, in FFY 2015.
  - Pending legislative adoption, the proposed organizational standards will be formally implemented in FFY 2016.
  
- Create Process for Reporting
  - CAAs will report on meeting the proposed standards during on-site reviews during FFY 2015 and FFY 2016.
  - The SCSO will modify CSBG program and fiscal monitoring tools for compliance with the proposed standards and will include the documentation recommended in the proposed standards as a means of demonstrating compliance.
  - The SCSO, in partnership with the State Association and CSBG grantees, will work toward 100% compliance with the proposed standards by FFY 2016.

**ii) Goal II:** To advocate for the continuation of funds, community involvement and support, and the expansion of programs to provide services and activities having a measurable impact on the causes and conditions of poverty.

**Objective 1:** Conduct planning activities to promote the successful results of CSBG-funded activities with the greatest potential impact on poverty in Utah.

**Activities:**

- The annual CSBG State Plan will be prepared and will outline the process and policies, including the requirement for a local community action plan, which is required in implementing the CSBG program assurances.
- The SCSO will actively support agency strategic planning sessions by attending pertinent meetings of the agency's board of directors.
- The SCSO will facilitate coordination of services through other grantees under its jurisdiction to more efficiently impact the lives of low-income citizens in the agency's respective communities.
- The SCSO will continue work on planning for the implementation of the proposed standards as detailed in Goal I, Objective 3 of this plan.
- A Needs Assessment will be conducted once every three years by each Community Action Agency to assist in determining the current and future needs of each community.

**Objective 2:** The SCSO will monitor and evaluate grantee performance through data collection, program assessment, compliance with the proposed organizational standards, and regular on-site visits.

**Activities:**

- Program Specialists will review and report on grantee activities by conducting site visits to each grantee annually; review and approve reports, contracts, amendments and other essential documents; review for compliance with the proposed organizational standards; and attend at least one meeting of the Board or Council of each grantee.

**Objective 3:** Consistent with available resources, training and technical assistance will be provided through the SCSO to increase administrative and operational effectiveness, including compliance with the proposed organizational standards.

**Activities:**

- Program Specialists will provide technical assistance to grantees on request and as dictated by monitoring results. State, local or regional training programs for boards and staff will be provided upon request and as is practical.
- Program Specialists will provide assistance regarding compliance with regulations, fiscal guidelines, budget, work program and report preparation, program development, problem solving, community involvement, and agency coordination.

**Objective 4:** The SCSO, in partnership with other organizations funded by CSBG, will research and report on problems and conditions caused by poverty and results of antipoverty efforts in Utah

**Activities:**

- The SCSO will coordinate with the State Association and with CAAs to gather agencies' data annually.
- Grantees will submit an annual report for the period covering October 1 to September 30th of each Federal fiscal year.
- The SCSO will respond to the National CSBG Information System (CSBG/IS) survey providing data collected from grantees on or before March 31, 2015, for FFY14.
- The SCSO will submit to the Governor and State Legislature a prepared report from IS data on CSBG activities and accomplishments.
- Through coordination activities, staff will assist in mobilizing resources and creating linkages among organizations and agencies, which are engaged in CSBG-related activities.
- Local Grantees will prepare a community action plan every three years by:
  - Conducting local needs assessments;
  - Describing resources available in their respective areas;
  - Performing an analysis of services designed to identify gaps and duplication;
  - Describing the agency policies and procedures regarding coordination. Documentation of these activities is provided with the grant application to the State;
  - The application will identify the other agencies and resources which coordinate and support the work program activities proposed;

- Outcome measures are required for each work program component. Components will relate to the national ROMA goals. In addition to improving the efficiency and effectiveness internally, local agencies will improve service quality and customer satisfaction that will be measured through surveys;
- The SCSO, in partnership with the State Association, will coordinate the efforts, and assist in facilitating, local and State public forums on low-income issues.

**2) Eligible Entities in FFY 2014**

**a) List of Eligible Entities:**

- 1) **Bear River Association of Governments - Public Community Action Agency**  
 170 North Main Street, Logan  
 Counties coverage area: Box Elder, Cache and Rich.  
 Total CSBG Budget: \$240,860.00  
 Total unduplicated number of clients served: 46,966  
 Total unduplicated number of families with one or more persons served: 12,519
  
- 2) **Ogden Weber Community Action Partnership -Private Community Action Agency**  
 3159 Grant Avenue, Ogden  
 Counties coverage area: Weber  
 Total CSBG Budget: \$282,628.00  
 Total unduplicated number of clients served: 1,961  
 Total unduplicated number of families with one or more persons served: 681
  
- 3) **Family Connection Center -Private Community Action Agency**  
 1360 East 1450 South, Clearfield  
 Counties coverage area: Davis and Morgan  
 Total CSBG Budget: \$245,090.00  
 Total unduplicated number of clients served: 6,708  
 Total unduplicated number of families with one or more persons served: 2,601
  
- 4) **Salt Lake Community Action Program - Private Community Action Agency**  
 764 South 200 West, Salt Lake City  
 Counties coverage area: Salt Lake and Tooele  
 Total CSBG Budget: \$1,051,885.00  
 Total unduplicated number of clients served: 83,962  
 Total unduplicated number of families with one or more persons served: 22,854
  
- 5) **Community Action Services and Food Bank- Private Community Action Agency**  
 815 South Freedom Blvd, Suite 100, Provo  
 Counties coverage area: Utah, Wasatch, and Summit  
 Total CSBG Budget: \$620,202.00  
 Total unduplicated number of clients served: 20,303  
 Total unduplicated number of families with one or more persons served: 7,865
  
- 6) **Uintah Basin Association of Governments - Public Community Action Agency**  
 330 East 100 South, Roosevelt  
 Counties coverage area: Duchesne, Uintah, Daggett  
 Total CSBG Budget: \$93,353.00

Total unduplicated number of clients served: 4,565

Total unduplicated number of families with one or more persons served: 1,902

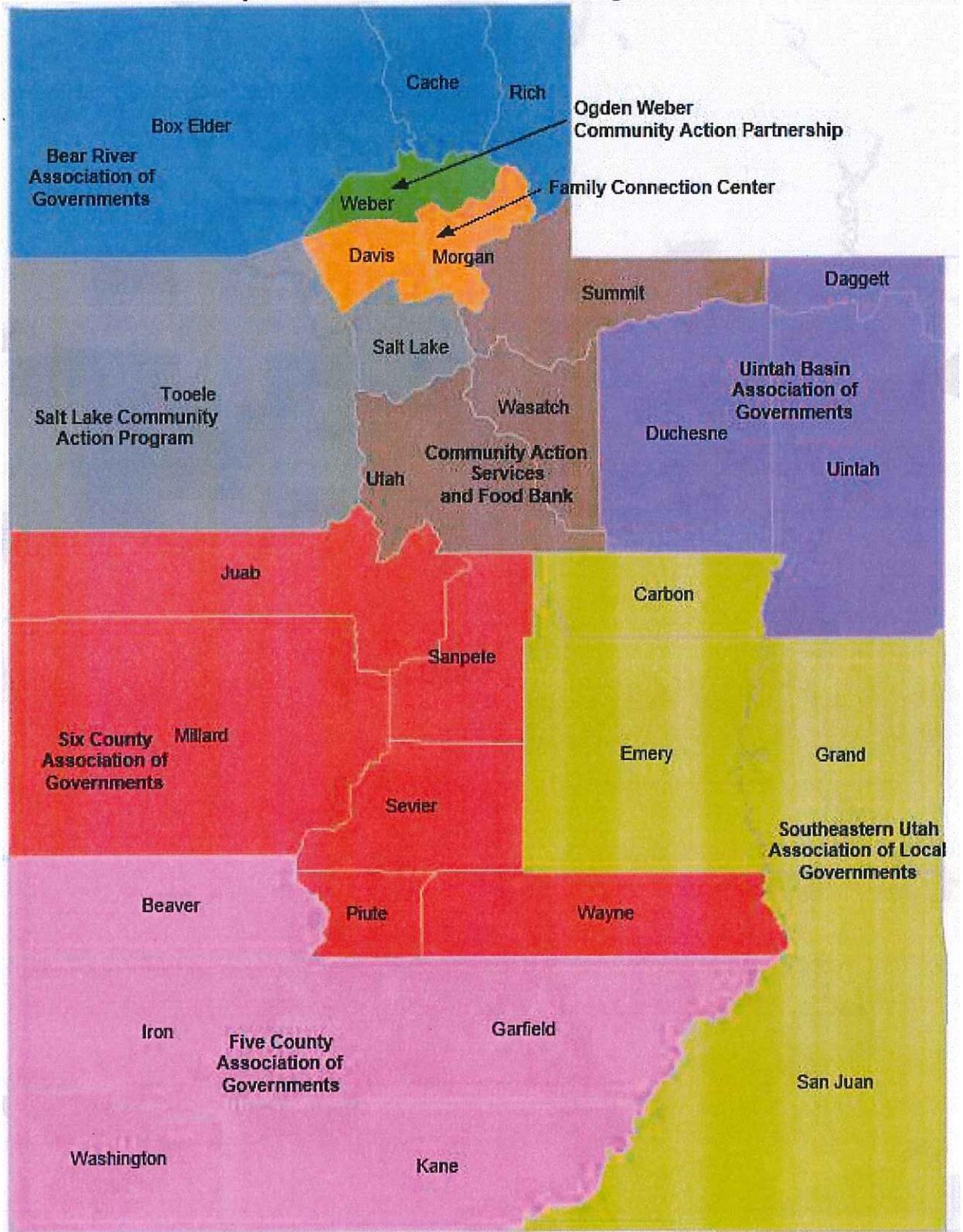
- 7) **Six County Association of Governments - Public Community Action Agency**  
250 North Main, Richfield  
Counties coverage area: Juab, Millard, Sanpete, Sevier, Piute and Wayne.  
Total CSBG Budget: \$135,914.00  
Total unduplicated number of clients served: 6,471  
Total unduplicated number of families with one or more persons served: 2,458
  
- 8) **Southeastern Utah Association of Local Governments - Public Community Action Agency**  
375 South Carbon Avenue, Price  
Counties coverage area: Carbon, Emery, Grand, and San Juan.  
Total CSBG Budget: \$130,627.00  
Total unduplicated number of clients served: 1,866  
Total unduplicated number of families with one or more persons served: 859
  
- 9) **Five County Association of Governments - Public Community Action Agency**  
906 North 1400 West, St. George  
Counties coverage area: Beaver, Iron, Garfield, Kane, and Washington.  
Total CSBG Budget: \$292,937.00  
Total unduplicated number of clients served: 8,787  
Total unduplicated number of families with one or more persons served: 4,003

**Entities that received Discretionary Funding**

- 10) **Community Action Partnership of Utah – State CAA Association**  
230 South 500 West, Suite 260, Salt Lake City  
Total Award: \$95,000.00
  
- 11) **United Way of Salt Lake – Private Non-profit**  
237 East 200 South--#300, Salt Lake City  
Total Award: \$25,000.00

b) The following Map depicts the location of CSBG grantees in the State of Utah:

**State of Utah**  
**Community Service Block Grant Planning Districts**



**3) Distribution and Allocation of Funds**

**a) Planned Distribution of Funds for FFY 2015 and FFY 2016**

The American Community Survey (ACS) 2007-2011 poverty status data is used for the formula. The amounts reflect the FFY 2014 award received by the State of Utah for the period of October 1, 2013, to September 30, 2014. The FFY 2015 and FFY 2016 allocations are reflected as follows:

Agency	FFY 2014	FFY 2015	FFY 2016
Bear River Association of Governments	\$ 240,860.00	\$ 240,860.00	\$ 240,860.00
Ogden Weber Community Action Partnership	\$ 282,628.00	\$ 282,628.00	\$ 282,628.00
Family Connection Center	\$ 245,090.00	\$ 245,090.00	\$ 245,090.00
Salt Lake Community Action Program	\$ 1,051,885.00	\$ 1,051,885.00	\$ 1,051,885.00
Community Action Services and Food Bank	\$ 620,202.00	\$ 620,202.00	\$ 620,202.00
Six County Association of Governments	\$ 135,914.00	\$ 135,914.00	\$ 135,914.00
Five County Association of Governments	\$ 292,937.00	\$ 292,937.00	\$ 292,937.00
Uintah Basin Association of Governments	\$ 93,353.00	\$ 93,353.00	\$ 93,353.00
Southeastern Utah Association of Local Governments	\$ 130,627.00	\$ 130,627.00	\$ 130,627.00
<b>TOTAL</b>	<b>\$ 3,093,496.00</b>	<b>\$ 3,093,496.00</b>	<b>\$ 3,093,496.00</b>

**LIMITATION ON USE OF GRANTS FOR CONSTRUCTION**

Grants made available under this program will not be used by the State or by grantees for the purchase or improvement of land, or the purchase, construction or permanent improvement of any building or other facility except for low-cost weatherization or other energy-related home repairs. The SCSO will accept and review requests for waivers of the purchase limitation that comply with the DHHS/OCS requirements. Requests meeting this requirement will be forwarded with recommendation from the SCSO to OCS for approval.

**B. Criteria and Distribution Formula**

FFY 2015 and FFY 2016

The CSBG funds were distributed on a base + formula allocation and set as a proportional share of CSBG funding. Each eligible entity received a \$50,000 base allocation; the allocation was then increased proportionally based upon the percentage of the State's population in poverty (specifically, 125% of poverty—ACS 2007-2011 Poverty Status Report) that resides in each jurisdiction. When Federal appropriations are higher or lower than the baseline, each agency's appropriation level will be increased/decreased proportionately with the actual funds appropriated.

Percentage of total State allotment of CSBG Funds for FFY 2015 and FFY 2016 is allocated to:

Type of Entity	Percentage	Allotment with base
Private Non-Profit Entities	64%	\$2,199,805.00
Public Entities	26%	\$893,691.00
State Administrative Expenses	5%	\$171,860.00
State Discretionary Expenditures	5%	\$171,861.00

**C. Use of Restricted Funds**

A minimum of 90% of the CSBG funds will be distributed to eligible entities:

<b>Utah Allocation</b> .....	<b>\$3,437,217.00</b>
<b>State Admin (5% of Utah Allocation)</b> .....	<b>\$171,860.00</b>
<b>Discretionary Funds (5% of Utah Allocation)</b> .....	<b>\$171,861.00</b>
<b>Pass through/Community Action Agency Funds</b> <b>(90% of Utah Allocation)</b> .....	<b>\$3,093,496.00</b>
Agency base (\$50,000 x 9 agencies).....	\$450,000.00
Allocation (with base subtracted—to be used with % of poverty).....	\$2,643,496.00

Beginning with FFY 2000, no funds have been recaptured and redistributed, as allowed under Section 675C(a)(3) of the Act.

**D. Distribution and Use of Discretionary Funds:**

An amount of 5% of the total award is discretionary and will be distributed to support statewide coordination and communication among eligible entities, to support innovative programs and activities conducted by community action agencies or other community based organizations to eliminate poverty, promote self-sufficiency, and enhance community revitalization. Discretionary grants will be used to address the following State goals and objectives:

- 1) Training, Technical Assistance (T/TA) and Capacity Building for organizations and entities seeking to end poverty and homelessness. The SCSO anticipates need for T/TA with the planned process for implementation of the proposed organizational standards. Discretionary funds will be prioritized to support this effort. One discretionary grantee with a program outside of this focus, The United Way (2-1-1 program), will no longer be funded as the program received full funding through the State legislature. The SCSO specifically anticipates need for the T/TA as detailed in Objective 3 of this plan (pp. 12-14):
  - a. The SCSO will designate staff resources to work directly with CAA partners and their boards to meet the proposed organizational standards. The SCSO, in partnership the State Association, will help the CAAs meet standards agencies identified as unmet in their self-assessments. Common areas of challenge include board development, strategic planning and risk assessment.
  - b. State Association support of proposed standards, as detailed in Objective 3 (pp.12-14), including ongoing one-on-one follow-up sessions with the CAAs as well as ongoing ROMA training.
  - c. National trainers for ROMA Next Gen, IS changes, and other commonly held CAA challenges beyond the scope of the State Association and the SCSO.
- 2) Development and distribution of information and resources, by utilization of technology, and best practices in dealing with poverty issues.
- 3) Facilitation of active involvement in national organizations to assist Community Action Agencies in achieving the proposed organizational standards.
- 4) Service as a conduit for community understanding and involvement on the issues of poverty to increase mechanisms and support for involving low-income Utahns in the problem solving processes of their respective community.
- 5) Projects relating to poverty and homeless issues identified as a high priority by community.

Grants may be awarded throughout the program year to support the above goals and objectives. Applications will be solicited for specific grant opportunities identified as high priorities within the outlined objectives of the discretionary funding. Resources will be coordinated to maximize the efficiency of accomplishing the above goals.

**E. Description of Use of Administrative Funds:**

An amount not to exceed 5% of the total award is used to offset the costs associated with the State level administrative oversight of the CSBG program. State funding is also used to support the staff costs associated with the oversight of the CSBG program.

**F. State Community Services Program Implementation:**

**1) Program Overview**

**a) Service Delivery System:**

Utah's CSBG network consists of nine community action agencies, five of which are public, and four of which are private. CSBG grantees meet the requirements of the CSBG Act through a variety of programs and activities. Changing local needs and the availability of resources are reflected in the annual application. Some agencies emphasize case management and family development programs, with others emphasizing emergency services, housing and nutrition.

The work program identifies the problem area and outlines the objective, activities, and projected outcomes. The semi-annual progress report shows accomplishments and includes data on client management goals that fulfill its mission, State requirements, and the mandates of Federal legislation. Program administration includes planning and coordination, monitoring and oversight, characteristics and grantee level of effort.

Eligible entities include:

Bear River Association of Governments in Logan; Serving Northern Utah-Rural  
Ogden Weber Community Action Partnership in Ogden; Northern Utah-Urban  
Family Connection Center in Clearfield; Northern Utah-Urban  
Salt Lake Community Action Program in Salt Lake City; Northern Utah-Urban  
Community Action Services and Food Bank in Provo; Central Utah-Urban  
Six County Association of Governments in Richfield; Central Utah- Rural  
Five County Association of Governments in St. George; Southwestern Utah-Rural  
Uintah Basin Association of Governments in Roosevelt; Northeastern-Rural  
Southeastern Utah Association of Local Governments in Price; Southeastern Utah-Rural

**b) Linkages**

Linkages, as described in Sec. 675 (C) of the CSBG Act, occur with the: "(1) use (of) funds available under this subtitle—(D) to coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to low-income individuals." Linkages occur as local grantees prepare a community action plan every three years by conducting local problem assessments, describing resources available in their respective areas, performing an analysis of services designed to identify gaps and duplication, and finally, describing the agency policies and procedures regarding coordination. Local grantees are working to expand their strategic planning beyond the 3 Year Needs Assessment conducted in their communities. The CAAs coordinate with their local Continuum of Care and their local homeless coordinating committees to extend community involvement in their agencies, enhance integration of services, maximize impact, and deepen understanding of need. These linkages not only provide more effective service delivery, but also help agencies

meet the proposed organizational standards addressing consumer input and involvement as well as strategic planning.

Documentation of linkages is provided with the grant application to the State. The application identifies the other agencies and resources which coordinate and support the work program activities proposed.

**c) Coordination with other Public and Private Resources**

Local grantees in Utah have been leaders in the development of partnerships with other public and private resources. Grantees have initiated partnerships resulting in a statewide emergency food network and local continuum of care planning processes that involve public, private and faith-based providers. These and other partnerships will be strengthened and expanded to include new partners and resources.

Grantees utilize CSBG funding to support core operations and many antipoverty services. Because of the flexible nature of CSBG funding, this permits the shaping of programs to meet local needs. CSBG provides the funding that allows leaders the time, facilities, and staff to mobilize resources, and to plan and integrate the programs to best meet the community needs. Local grantees achieve their mission of creating opportunities for low-income people to overcome the challenges of poverty by coordinating multiple programs and resources. The local grantee community action plan and annual report fully delineate the source and type of resource utilized and a description of the coordination activity. Local grantees are seen in their local community as leaders in coordinating and mobilizing resources to assist those in poverty. In addition, local grantee staff members often serve on local and/or State boards and councils to help ensure coordination, non-duplication of effort, and provision of feedback from the low-income population.

**d) Innovative Community and Neighborhood based initiatives**

CSBG grantees are at the forefront of innovation in Utah and are responsible for some of the best new initiatives to take place in the State. Grantees will continue to lead innovative programs in Utah through the development of statewide case management systems with the goal of self-sufficiency, including: continued expansion of individual development accounts (IDAs) and EITC Outreach and VITA sites throughout the CSBG network; participation in the implementation of Utah-Saves, an asset-building campaign; development of a model partnership for community problem-solving called the Center for Economic Opportunity; and development and implementation of education on predatory lending. CSBG grantees have also provided leadership in the development and implementation of public transportation programming in rural communities.

**2. Community Needs Assessments**

Prior to funding, the SCSO secures from each eligible entity a community action work plan that includes a community needs assessment for the community to be served. The plan is reviewed with all community action agencies by the SCSO Director, the assigned CSBG Program Specialist, and the Fiscal Specialist.

Category six of the proposed organizational standards addresses strategic planning. The Community Needs Assessment (proposed standard 6.4 for private and public CAAs) is one tool agencies should use as they pursue strategic planning. The proposed standards challenge CAAs to expand the scope of strategic planning beyond the unmet need in the community to also include agency strength, effectiveness, efficiency, and strategic partnerships required to meet community need.

The SCSO will provide training and technical assistance to all grantees to assist them in program

development and implementation, compliance with State and Federal regulations, and reporting and management information systems. Throughout the State, CSBG providers hold public forums, or conduct needs assessments through survey instruments and/or public hearings in order to develop programs which best address high priority needs. Assurance is given that each grantee will allow, "before expending such funds, low-income individuals to comment on the uses for which such organization purposes to expend such funds." The steps required to ensure this participation are contained in the contract (paragraph B.4), and the State Rules (R990-100-33).

Other research and needs assessments may be conducted and reported through an annual CSBG report, a statewide Poverty Report, and a United Way needs assessment, and are presented annually at several events throughout the year.

### **3. Tripartite Boards:**

To assure the low-income citizen participation in the planning, administration, and evaluation of projects, the State Community Services Office has issued the following guidance to CAAs (also reflected in proposed standard 5.1 and 5.2 for public and private CAAs):

#### **a) For Private Non Profit Community Action Agencies:**

Boards of community action agencies and public organizations will be constituted so as to assure that (1) one-third of the members of the board are elected public officials, currently holding office, or their representatives, except that if the number of elected officials reasonably available and willing to serve is less than one-third of the membership of the board, membership on the board of appointive public officials may be counted in meeting such one-third requirement; (2) at least one-third of the members are persons chosen in accordance with democratic selection procedures adequate to assure they are representative of the low-income in the area served; and (3) the remainder of the members are officials or members of business, industry, labor, religious, welfare, education, or other major groups and interests in the community.

#### **b) For Public Community Action Agencies:**

At a minimum, public CAAs should have an advisory board for the CSBG program which includes low-income representatives from the region served by the agency. The desired structure is a tripartite advisory board with a minimum of one-third consumer representatives.

This requirement is monitored during semi-annual participation with the agency during board meetings and planning processes to ensure compliance. Agencies found out of compliance will be given technical assistance to fully implement the above requirement.

The board structure ensures the participation of the low-income sector in both the planning and implementation of all CSBG projects. The involvement of the low-income sector has always been required and will continue to be required and documented prior to the distribution of CSBG funds to local grantees.

### **4. Client Eligibility:**

All clients served under the CSBG program will be at or below 125% of the Federal Poverty Level.

**5. State Charity Tax Program:**

The State of Utah does not participate in a charity tax credit program.

**6. Programmatic Assurances:**

Development and monitoring of programs funded by CSBG is an essential part of the SCSO's responsibilities. Each year the application process addresses all the programmatic assurances to guarantee each grantee is committed to both complying with the assurance and developing programs designed around the assurances according to local needs. Grantees develop specific programs designed to provide the most effective solutions to the problems of poverty identified in their communities within the constraints of funding allocations. The programs fall under the following broad categories listed in the CSBG Act: reduction of poverty, revitalization of low-income communities, and the empowerment of low-income individuals and families to become more self-sufficient. Each program reflects goals of attaining self-sufficiency, family stability, or community revitalization.

The CSBG contracting occurs annually in conjunction with the application process. An application package is sent to each CSBG grantee prior to the submission date. A submission of Planning Documents is required every three years. This contracting and application process is the means by which the State carries out the programmatic assurances and includes the following:

- 1) Every three years a Planning Process to produce the following:
  - Community Needs Assessment
  - Narrative of Area Poverty Conditions
  - Description of Low-Income Problem Identification Methodology
  - Analysis of Identified Problems
  - Description of Service Delivery System
  - Problem Summary (those problems selected through Board Prioritizing)
  - Description of Coordination
  
- 2) Each year the CSBG Application includes the following:
  - Certification of Assurances
  - Description of Coordination for each Project
  - Grantee Work Program (includes strategies to be used in achieving outcomes, outputs, and linkages)
  - Budget

Work programs are rated on the criteria developed in response to the planning document and application process and reviewed by a team from DWS. Work programs must meet minimum criteria to receive funding. Agencies may be asked to participate in pre-funding conferences with the SCSO to receive technical assistance. Contracts are executed by the grantee and DWS/SCSO to be effective October 1 of each fiscal year. The applications address the programmatic assurances and outline the strategy that each agency will employ to meet the national goals of self-sufficiency, education, employment, health, housing, income management, linkages, nutrition, and youth programs. All CSBG grantees are responsible for the selection and implementation of programs that will have maximum community impact. Community organization and resource mobilization are integral parts of grantee operation. Information from program progress reports demonstrates grantee ability to utilize existing funding sources and leverage new sources, to partner with local and statewide service delivery agencies to build comprehensive service delivery programs, and to maximize the assets of the community to best meet the needs of the community.

- a) Each eligible entity, as a condition to its receipt of funding under CSBG, shall submit a Community Action Plan to the SCSO. The State Community Services Office utilizes the contract and application process to ensure that agencies are implementing strategies that meet the following CSBG programmatic assurances:
- 1) Support activities that are designed to assist low-income families and individuals to:
    - i) remove obstacles and solve problems that block the achievement of self-sufficiency;
    - ii) secure and retain meaningful employment;
    - iii) attain an adequate education, with particular attention toward improving literacy skills of low-income families in the communities involved;
    - iv) make better use of available income;
    - v) obtain and maintain adequate housing and suitable living environment;
    - vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs;
    - vii) achieve greater community participation/grassroots efforts.
  - 2) Address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative, community-based youth development programs; and
  - 3) Make more effective use of and to coordinate with other programs (including State welfare reform efforts).
- b) Assurance 676 (b)(4): Eligible entities in the State, will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract the conditions of starvation and malnutrition among low-income individuals. Eligible entities may submit written requests to the SCSO to amend contracts so as to quickly respond to immediate community need.
- c) State Assurance 676(b)(5): The eligible entities in the State will coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998. As part of the Department of Workforce Services, the SCSO coordinates with eligibility and job training programs and with the CAAs to streamline program delivery and maximize impact.
- d) Assurance 676(b)(6): The State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such communities. The HEAT and Weatherization programs are housed within the same division as the SCSO—the Housing and Community Development Division. At the State level, strategic planning and coordination occurs on a regular basis.
- e) Assurance 676(b)(9): The State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of groups served by the State, including religious organizations, charitable groups, and community organizations. The SCSO supports two large, annual conferences (the Poverty Conference and the Homeless Summit) and facilitates the State Homeless Coordinating Committee and the local homeless coordinating councils. These forums draw representatives from religious groups, charitable organizations, and community organizations and provide opportunities for active engagement and exchange.

**G. Fiscal Controls and Monitoring:**

**1) State Program Monitoring**

Fiscal representatives of the State Community Services Office (SCSO) will conduct on-site visits for the primary purpose of monitoring expenditure and accountability of CSBG and local share funds. This monitoring will include a general review of the overall fiscal integrity of the agency, as well as an in-depth review of selected fiscal activities.

As required under Section 678B(a) of the Act, the SCSO conducts the following reviews of entities receiving CSBG awards:

- a) A full on-site review of each eligible entity at least once during each three-year period to determine whether they meet the performance goals, administrative standards, financial management requirements, and other State requirements through the review of agency records and interviews with agency personnel, board members and clients;
- b) An on-site review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the CSBG program (the SCSO had no newly designated agencies, nor are we anticipating any during FFY 2015 and FFY 2016, as all counties in the State are covered);
- c) Follow-up reviews, including prompt return visits to eligible entities that fail to meet the goals, standards, and requirements established by the SCSO. This is accompanied by specialized technical assistance support identified in the initial monitoring visit and any subsequent visits or interactions;
- d) Other reviews as appropriate, including reviews of entities whose independent audit report indicates serious internal control problems or other significant findings and entities with programs that have had other Federal, State or local grants (other than assistance provided under the CSBG program) terminated for cause.
- e) Date of last audit conducted and period covered by the audit for each eligible entity:
  - Salt Lake Community Action Program: report issued 11/19/2013 for fye: 6/30/2013
  - Community Action Services and Food Bank: report issued 1/21/2014 for fye: 6/30/2013
  - Southeastern Association of Local Governments: report issued 12/18/2013 for fye: 6/30/2013
  - Uintah Basin Association of Governments: report issued 11/18/2013 for fye: 6/30/2013
  - Ogden Weber Community Action Partnership: report issued 6/27/2013 for fye: 9/30/2012
  - Bear River Association of Governments: report issued 11/5/2013 for fye: 6/30/2013
  - Five County Association of Governments: report issued 11/1/2013 for fye: 6/30/2013
  - Six County Association of Governments: report issued 11/5/2013 for fye: 6/30/2013
  - Family Connection Center: report issued 11/18/2013 for fye: 6/30/2013

Randomly selected samples of expenditures selected from periodic financial reports submitted on RFF's are tested for compliance with the regulations and requirements of the CSBG contract and for conformity with Generally Accepted Accounting Principles to determine that adequate systems and controls are in place to safeguard the Federal funds, and that Federal funds are being used according to the approved budget.

Date of scheduled on-site review for each eligible entity:

Salt Lake Community Action Program: June 2015  
Community Action Services and Food Bank: June 2015  
Southeastern Association of Local Governments: August 2014  
Uintah Basin Association of Governments: May 2015

Ogden Weber Community Action Partnership: September 2014  
Bear River Association of Governments: June 2015  
Five County Association of Governments: September 2014  
Six County Association of Governments: September 2014  
Family Connection Center: April 2015

As a condition of the CSBG award, each sub-recipient must comply with the Office of Management and Budget (OMB) audit requirements. Currently, OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations, requires that a non-Federal entity that expends \$500,000 or more in Federal awards during the non-Federal entity's fiscal year must have a single or program-specific audit conducted in accordance with A-133. An independent CPA selected by the Board of each eligible entity shall conduct the agency's annual audit. The audit must be completed and the data collection form and reporting package must be submitted within the earlier of 30 calendar days after receipt of the auditor's report, or nine months after the end of the audit period.

This threshold increases to \$750,000 or more in Federal awards upon the effective date of the new OMB "Super Circular" Uniform Guidance in 2 CFR Part 200. The new audit requirements appear in Subpart F of that document and are effective for all Federal awards or funding increments provided on or after December 26, 2014, and for non-Federal entities with fiscal years beginning on or after that date. Each eligible entity shall have an audit prepared in accordance with the OMB requirements.

SCSO fiscal staff will review the annual audits of each CSBG grantee and periodically review monitoring reports available from other funding sources. The financial reports to the Board of Directors will also be subject to review by the SCSO's fiscal representatives. In addition to on-site and desktop reviews, fiscal staff will provide training and technical assistance as requested or deemed necessary.

Nonprofit sub-grantees receiving less than \$25,000 shall submit unaudited Financial Statements, in accordance with guidelines within sixty days following the termination of the agreement.

In addition to the full on-site fiscal review, the State CSBG Program Director and the SCSO Program Specialists may periodically make monitoring visits to evaluate each grantee's progress towards achieving the objectives outlined in the three-year planning documents and annual work plans, as well as to:

- a) Provide routine and/or requested training and technical assistance
- b) Verify contract compliance including Federal assurances and State requirements;
- c) Observe grantee service and types of assistance provided;
- d) Assess grantee performance regarding operations and program activities;
- e) Collect data to assist in fulfilling reporting requirements;
- f) Ensure ongoing contact with grantees;
- g) Submit field visit reports certifying grantee program activities; and
- h) Assess data contained in the periodic requests for reimbursement of expenditures; semi-annual program progress reports; and annual year-end report.

The year-end report submitted by each eligible entity will cover a reporting period consistent with the Federal fiscal year, which is October 1st through September 30th, and will provide an account of all programs operated with or supported by CSBG funds. The information will include the types of programs, program outcomes, numbers of persons served, number of times service was given, and the amount of CSBG dollars expended. Intensified efforts will be made in the collection of complete and accurate client characteristics and program data through the use of a

computer management information system.

Local grantees are to design programs to expend all CSBG funds during the fiscal year for which allocated. However, if any funds are not spent at the end of the fiscal year, the State will allow the carry-over of such funds to be used as part of their programming in the following fiscal year as allowed under Sec. 679 (6). The SCSO shall enter into agreement with the Office of the State Auditor to conduct financial and compliance audits of administration of funds received under the CSBG in accordance with GAO audit guides.

## **2) Corrective Action, Termination and Reduction of Funding**

The State assures that any community action agency or migrant and seasonal farm worker organization which received funding in the previous fiscal year under this Act will not have its present or future funding terminated under this Act, or reduced below the proportional share of funding it received in the previous fiscal year, unless after notice, and opportunity for hearing on the record, the State determines that cause existed for such termination or such reduction subject to the procedures and review by the Secretary as provided in section 676(a). For the purposes of making a determination with respect to a funding reduction, the term 'cause' includes:

- a) A statewide redistribution of funds under this subtitle to respond to:
  - i. the results of the most recently available census or other appropriate data;
  - ii. the establishment of a new eligible entity;
  - iii. severe economic dislocation; and
  - iv. the failure of an eligible entity to comply with the terms of its agreement to provide services under this subtitle...
- b) Grantees shall be considered in default of their obligations under this definition if:
  - i. grantee persistently disregards laws, rules, ordinances, regulations or orders of any public authority having jurisdiction;
  - ii. performance of the work fails to substantially conform to the requirements of the contract;
  - iii. grantee abandons or refuses to proceed with any or all of the work;
  - iv. grantee performs work in which officers or employees of the grantee have a direct or indirect interest that would result in a conflict of interest.

## **3) Fiscal Controls, Audits and Withholding:**

The State has established fiscal controls and fund accounting procedures to assure the proper disbursement of, and accounting for, Federal funds paid to the State under this subtitle, including procedures for monitoring. The State of Utah undergoes a Single Audit under OMB A-133 on an annual basis. Upon the effective date of the new OMB "Super Circular" Uniform Guidance, the State will comply with Subpart F of that document. The most recent audit report issued December 2, 2013, covered the State's fiscal year July 1, 2012, through June 30, 2013.

The contract with each eligible entity contains a provision that requires the agency to abide by the cost and accounting standards of the applicable Office of Management and Budget (OMB) Circulars. The State Community Services Office will monitor grantee compliance for fiscal requirements, identify technical assistance needs for the improvement of fiscal control systems, and follow up needs for corrective action.

Fiscal review and control processes are provided through the CSBG Program Director, the SCSO Fiscal Auditor, the SCSO Program Specialists, the Division Accountant and the State Finance Office. Grantees are required to submit budgets detailing the proposed use of CSBG funds. Grantees are encouraged to submit monthly financial reports detailing expenditures by budget cost-category. The SCSO reviews the financial reports for accuracy, for consistency with the approved budget, and for expenditure patterns. Payment is approved by the SCSO's

staff and/or Program Director and sent through the accounting office to the State Finance Office for comparison with the contract amount and payment. Grantees are monitored during the program year to determine compliance with contractual obligations and statutes.

To receive funds at any time, local grantees must demonstrate acceptable program and fiscal accountability and performance. The local grantee must adopt assurances into policies relative to travel, personnel and other areas as appropriate and consistent with Federal and State regulations. The local grantee must provide the assurance that fiscal control and fund accounting procedures are established to assure the proper disbursement of, and accounting for, Federal funds paid to the State under the Act. The State will provide a minimum standard as a performance requirement. Any audit exceptions identified in the latest audit report must have been corrected, with assurances contained in the application.

- a) In accordance with section 678D of the Act, the State agrees to permit and to cooperate with any Federal investigations undertaken in accordance with the above law. In the event of an investigation, the State will make available all required records and documents promptly, upon request. Through contractual stipulation, local grantees will be required to make available all pertinent records and documents to the Secretary of Health and Human Services or the Comptroller General of the United States or duly authorized representative(s).
- b) The SCSO has developed and published Rules according to State regulation identified as "R990. Community and Economic Development, Community Development Services." R990-100-22 describes "Suspension or Termination of Funds" and R990-100-27 provides the "Appeals Procedure." In accordance with PL. 98-558, the State will not terminate CSBG funding to a grantee until the Secretary of DHHS confirms the State finding of cause.
- c) The SCSO will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for representation, as per section 676(b)(12) of the Act. As detailed in the "Tripartite Boards" section of this CSBG State Plan (p.23), this requirement is monitored during semi-annual participation with the agency during board meetings and planning processes to ensure compliance. Agencies with a weakness in this area will be given technical assistance to fully implement the above requirement.

## **H. Accountability and Reporting Requirements**

### **1) Results Oriented Management and Accountability**

The National Office of Community Services has developed a series of Goals and Measures to achieve compliance with the Government Performance and Results Act of 1993. Each state is to respond as to the measures under specific goals (listed below with accompanying tables) that local grantees will address.

The nine Community Action Agencies (staff and boards) have been trained and continue to receive ongoing training in outcome based management, and Community Action Agencies have implemented ROMA (Results Oriented Management Accountability) concepts for all CSBG related activities to guide needs assessment, agency mission review, activity planning, resource allocations, service delivery, and measuring and reporting results. All agencies are required to submit reporting on the following six national goals as identified by ROMA:

- Goal 1: Low-income people become more self-sufficient.
- Goal 2: The conditions in which low-income peoples' lives are improved
- Goal 3: Low-income people own a stake in their Community
- Goal 4: Partnerships among supporters and providers of service to low-income people are achieved
- Goal 5: Agencies increase their capacity to achieve results.
- Goal 6: Low-income people, especially vulnerable populations achieve their potential by strengthening family and other supportive systems.

**The CAA's combined data reporting for FFY 2013 follows:**

Goal #	# Agencies Reporting	FFY 2013 Goals and Indicators
<b>1</b>		<b>Low-Income People Become More Self-Sufficient</b>
<b>1.1</b>		<b>Employment: #/% of people who get a job, become self-employed or improve their income.</b>
1.1A	6	Unemployed and obtained a job
1.1B	2	Employed and maintained a job for at least 90 days
1.1C	2	Employed and obtained an increase in employment income
1.1D	1	Achieved "living wage" employment and benefits
<b>1.2</b>		<b>Employment Supports: #/% of people for whom barriers to employment are eliminated.</b>
1.2A	4	Obtained pre-employment skills/competencies required for employment and/or received training program certification or diploma
1.2B	3	Completed ABE/GED and received certificate or diploma
1.2C	1	Completed post-secondary education program and obtained certificate or diploma
1.2D	0	Enrolled children in "before" or "after" school programs, in order to acquire or maintain employment
1.2E	1	Obtained care for child or other dependent in order to acquire or maintain employment
1.2F	3	Obtained access to reliable transportation and/or driver's license in order to acquire or maintain employment
1.2G	1	Obtained health care services for themselves or a family member in support of employment stability
1.2H	4	Obtained safe and affordable housing in support of employment stability
1.2I	2	Obtained food assistance
1.2J	3	Obtained non-emergency LIHEAP energy assistance
1.2K	2	Obtained non-emergency WX energy assistance
1.2L	1	Obtained other non-emergency energy assistance (State/Local/Private energy programs. Do not include LIHEAP)
<b>1.3</b>		<b>Economic Asset Enhancement and Utilization: #/% of HOUSEHOLDS that achieve an increase in financial skills and/or assets, and the aggregate amount of those assets.</b>
1.3A		<i>Enhancement</i>
1.3A1	4	Number and percent of participants in tax preparation programs who identify any type of Federal or State tax credit and the aggregated dollar amount of credits

1.3A2	0	Number and percentage obtained court-ordered child support payments and the expected annual aggregated dollar amount of payments
1.3A3	3	Number and percentage enrolled in telephone lifeline and/or energy discounts with the assistance of the agency and the expected aggregated dollar amount of savings
1.3B		<i>Utilization</i>
1.3B1	3	Number and percent demonstrating ability to complete and maintain a budget for over 90 days
1.3B2	1	Number and percent opening an Individual Development Account (IDA) or other savings account and increased savings, and the aggregated amount of savings
1.3B3a	3	Number and percent capitalizing a small business due to accumulated savings
1.3B3b	0	Number and percent purchasing a home due to accumulated savings
<b>2</b>		<b>The Conditions in Which Low-Income People Live are Improved</b>
<b>2.1</b>		<b>Community Improvement and Revitalization: Increase in, or preservation of opportunities and community resources or services as a result of projects, initiatives or advocacy.</b>
2.1.A	3	Accessible "living wage" jobs created or retained in the community
2.1.B	0	Safe and affordable housing units created in the community
2.1.C	1	Safe and affordable housing units in the community preserved or improved through construction, weatherization or rehabilitation achieved by community action activity or advocacy
2.1.D	2	Accessible and affordable health care services/facilities for low-income people created or maintained
2.1.E	0	Accessible, safe and affordable childcare or child development placement opportunities for low-income families created or maintained
2.1.F	2	Accessible "before" school and "after" school program placement opportunities for low-income families created or maintained
2.1.G	1	Accessible new, preserved, or expanded transportation resources available to low-income people, including public or private transportation
2.1.H	2	Accessible preserved or increased educational and training opportunities for low-income people in the community, including vocational, placement literacy, and life skill training, ABE/GED, and post-secondary education
2.1.I	1	Accessible or increased educational and training placement opportunities, or those that are saved from reduction or elimination, that are available for low-income people in the community, including vocational, literacy, and skill training, ABE/GED, and post-secondary education.
<b>2.2</b>		<b>Community Quality of Life and Assets: The quality of life and assets in low-income communities is improved as a result of initiatives or advocacy.</b>
2.2.A	1	Increases in community assets as a result of a change in law, regulation or policy, which results in improvements in quality of life and assets
2.2.B	2	Increase in the availability or preservation of community facilities
2.2.C	1	Increase in the availability or preservation of community services to improve public health and safety
2.2.D	1	Increase in the availability or preservation of commercial services within low-income neighborhoods
2.2.E	3	Increase or preservation of neighborhood quality-of-life resources
2.3.A	8	Number of community members mobilized by Community Action that participate in community revitalization and antipoverty initiatives

2.3.B	9	Number of volunteer hours donated to the agency (This will be all volunteer hours)
<b>3</b>		<b>Low-Income People Own a Stake in Their Community</b>
<b>3.1</b>		<b>Civic Investment</b>
3.1.A	8	The number of volunteer hours donated to Community Action
<b>3.2</b>		<b>Community Empowerment through Maximum Feasible Participation: The number of people mobilized to engage in activities that support and promote their own well-being and that of the community.</b>
3.2.A	8	Number of low-income people participating in formal community organizations, government, boards or councils that provide input to decision-making and policy setting through community action efforts
3.2.B	2	Number of low-income people acquiring businesses in their community as a result of community action assistance
3.2.C	2	Number of low-income people purchasing their own homes in their community as a result of community action assistance
3.2.D	5	Number of low-income people engaged in non-governance community activities or groups created or supported by community action
<b>4</b>		<b>Partnerships Among Supporters and Providers of Service to Low-Income People Are Achieved</b>
4.1	9	The number of organizations, both public and private, community action actively works with to expand resources and opportunities in order to achieve family and community outcomes
<b>5</b>		<b>Agencies Increase Their Capacity to Achieve Results</b>
<b>5.1</b>		<b>Broadening the Resource Base: The number of dollars mobilized by community action, including amounts and percentages from:</b>
5.1A	2	Number of Certified Community Action Professional
5.1B	0	Number of Nationally Certified ROMA Trainers
5.1C	6	Number of Family Development Certified Staff
5.1D	1	Number of Child Development Certified Staff
5.1E	9	Number of Staff attending trainings
5.1F	8	Number of Board Members attending trainings
5.1.G	9	Hours of staff in trainings
5.1.H	8	Hours of Board Members in trainings
<b>6</b>		<b>Low-Income People, Especially Vulnerable Populations, Achieve Their Potential by Strengthening Family and Other Supportive Services</b>
<b>6.1</b>		<b>Independent Living: The number of vulnerable individuals receiving services from community action that maintain an independent living situation as a result of those services</b>
6.1.A	7	Senior Citizens (including reverse equity mortgage)
6.1.B	7	Individuals with Disabilities

<b>6.2</b>		<b>Emergency Assistance: The number of individuals or families that sought emergency assistance and received that assistance.</b>
6.2.A	8	Food
6.2.B	6	Emergency Payments to Vendors, including Fuel and Energy Bills
6.2.C	8	Emergency Rent or Mortgage Assistance
6.2.D	2	Emergency Car or Home Repair (i.e. structural, appliance, heating system, etc.)
6.2.E	4	Emergency Temporary Shelter
6.2.F	2	Emergency Medical Care
6.2.G	1	Emergency Protection from Violence Emergency Legal Assistance
6.2.H	1	Emergency Legal Assistance
6.2.I	2	Emergency Transportation
6.2.J	1	Emergency Disaster Relief
6.2.K	5	Emergency Clothing
<b>6.3</b>		<b>Child and Family Development: The # and % of all infants, children, youth, parents, and other adults participating in development or enrichment programs that achieve program goals, as measured by one or more of the following</b>
6.3A		<i>Infants and Children</i>
6.3A1	2	Infants and children obtain age appropriate immunizations, medical and dental care
6.3A2	3	Infant and child health and physical development are improved as a result of adequate nutrition
6.3A3	3	Children participate in pre-school activities to develop school readiness skills
6.3A4	2	Children who participate in pre-school activities are developmentally ready to enter Kindergarten or 1st Grade
6.3B		<i>Youth</i>
6.3B1	1	Youth improve physical health and development
6.3B2	2	Youth improve social/emotional development (including Sub for Santa)
6.3B3	3	Youth avoid risk-taking behavior for a defined period of time
6.3B4	1	Youth have reduced involvement with criminal justice system
6.3B5	3	Youth increase academic, athletic or social skills for school success by participating in before or after school programs
6.3C		<i>Parents and other adults</i>
6.3C1	3	Parents and other adults learn and exhibit improved parenting skills
6.3C2	3	Parents and other adults learn and exhibit improved family functioning skills
<b>6.4</b>		<b>Family and Supports (Senior, Disabled, and Caregivers)</b>
6.4A	0	Enrolled children in before or after school programs
6.4B	0	Obtained care for child or other dependent

6.4C	1	Obtained access to reliable transportation and/or driver's license
6.4D	1	Obtained health care services for themselves or family member
6.4E	2	Obtained and/or maintained safe and affordable housing
6.4F	2	Obtained food assistance
6.4G	3	Obtained non-emergency LIHEAP emergency assistance
6.4H	1	Obtained non-emergency WX energy assistance
6.4I	0	Obtained other non-emergency energy assistance (State/Local/Private energy programs. Do not include LIHEAP or WX)
<b>6.5</b>		<b>Service Counts</b>
6.5A	8	Food Assistance
6.5B	5	Pounds of Food
6.5C	4	Units of Clothing
6.5D	1	Rides Provided
6.5E	9	Information and Referral Calls

The progress toward the six national goals is reported to the State Community Services Office as part of the annual progress report submitted by the agencies with the CSBG-IS report. As a part of the annual report, the agencies include information that compares their projected outcome, the actual outcome, and the strategies that they undertook to achieve the goal. As part of the outcome measures, each agency will be able to report the status of the clients served as: expected to achieve the outcome in reporting period; in progress; or exited. Outcome measures are required for each work program component. Components will relate to the national goals of self-sufficiency, family stability, and community revitalization. In addition to improving the efficiency and effectiveness internally, local agencies will improve service quality and customer satisfaction that will be measured through surveys.

**2) Annual Report FFY14:**

- a) Performance Objectives
- b) Program Accomplishments and activities (Submitted in Conjunction with the National CSBG-IS Report. See Attachment VI)
- c) Comparison of Planned and Actual Expenditures for Prior Fiscal Year
  - (1) Planned Distribution of funds to eligible entities vs. Actual Expenditures

Planned FFY 2014	Actual FFY 2014
\$3,480,348.00	\$3,437,217.00

\*Beginning FY 2000, no funds have been recaptured and redistributed

(2) Planned Distribution of Funds for Discretionary Purposes

Planned	Actual
\$174,017.00	\$171,861.00

(3) Planned use of funds for State Administration vs. Actual

Planned	Actual
\$174,017.00	\$171,860.00

d) Profiles of Participants Served FFY13 (number and characteristic)

<b>Male:</b>	65,261	<b>Ethnicity</b>	
<b>Female:</b>	69,881	<b>African American:</b>	2,156
<b>Age: 0-5:</b>	20,491	<b>White:</b>	136,449
<b>6-11:</b>	23,477	<b>Hispanic:</b>	57,179
<b>12-17</b>	20,464	<b>Other:</b>	123,509
<b>18-23</b>	14,231	<b>Multi-race:</b>	3,050
<b>24-44</b>	40,407	<b>Native American</b>	2,676
<b>45-54</b>	16,316	<b>Asian</b>	1,688
<b>55-69</b>	10,105	<b>Native Hawaiian or Pacific Islander</b>	4,014
<b>70+</b>	4,013		

e) Statistical Report on CSBG Program Services FFY13

Service Category	Dollars Spent
Education	\$134,121.00
Emergency Services	\$571,242.00
Employment	\$121,078.00
Health	\$ 7,350.00
Housing	\$316,929.00
Income Management	\$177,748.00
Linkages	\$495,343.00
Nutrition	\$756,649.00
Economic Development	\$0
Self-Sufficiency	\$157,781.00
Special/Innovative Programs	\$156,700.00

f) Training and technical assistance provided by the State:

The State Community Services Office has provided, and will continue to provide, on-site technical assistance to the CSBG grantees. CSBG entities are ROMA compliant, and they submit programmatic reports twice yearly.

**Attachment I – Letter of Designation**



# STATE OF UTAH

GARY R. HERBERT  
GOVERNOR

OFFICE OF THE GOVERNOR  
SALT LAKE CITY, UTAH  
84114-2220

SPENCER J. COX  
LIEUTENANT GOVERNOR

July 7, 2014

Jeannine Chaffin, Director  
Office of Community Services  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, D.C. 20201

Dear Director Chaffin,

The Utah Department of Workforce Services, Housing and Community Development Division, has been designated as the state agency to administer funding from the Community Services Block Grant (CSBG) since 1981. I am pleased with the outcomes derived from the program and the efficient administration provided by the Division's State Community Services Office.

As Governor of the great State of Utah, it is my pleasure to designate Gordon D. Walker, Director of the Housing and Community Development Division, as the authorized agent to sign and certify to all assurances outlined in the state plan and application for CSBG funds. Thank you for your attention to this very important matter.

Sincerely,

Gary R. Herbert  
Governor

Cc: Gordon D. Walker, Director, HCD

**Attachment II – State CSBG Statutes**

## Attachment II: Utah State Code

### Title 35A Chapter 8 Section 1001

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#### **Title 35A Utah Workforce Services Code** **Chapter 8 Housing and Community Development Division** **Section 1001 Title.**

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##### **35A-8-1001. Title.**

This part is known as the "State Community Services Act."

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### Title 35A Chapter 8 Section 1002

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##### **35A-8-1002. Definitions.**

As used in this part:

- (1) "Community action agency" means a local subdivision of the state, a combination of political subdivisions, a separate public agency, or a private nonprofit agency, which:
    - (a) has the authority under its applicable charter or laws to receive funds to support community action activities and other appropriate measures designed to identify and deal with the causes of poverty in the state; and
    - (b) is designated as a community action agency by federal law, federal regulations, or the governor.
  - (2) "Community action program budget" means state funds, federal block grants, and federal categorical grants that are received by the state for community action activities.
  - (3) "Community action statewide organization" means community action programs, organized on a statewide basis, to enhance the capability of community action agencies.
  - (4) "Community Services Block Grant" means the Federal Community Services Block Grant Act, 42 U.S.C. Sec. 9901 et seq., and any corresponding federal regulations.
  - (5) "Local share" means cash or in-kind goods and services donated to a community action agency to carry out its responsibilities.
  - (6) "Low-income person" means a person who is a member of a household with a gross annual income equal to or less than 125% of the poverty standard accepted by the federal agency designated to establish poverty guidelines.
  - (7) "Office" means the State Community Services Office created in Section [35A-8-1003](#).
  - (7) "Service area" means the geographical area within the jurisdiction of a community action agency or a community action statewide organization.
-

**35A-8-1003. State Community Services Office created -- Purpose.**

- (1) There is created within the Housing and Community Development Division the State Community Services Office.
  - (2) The office shall strengthen communities by reducing poverty and improving the quality of life for low-income persons in this state.
- 

**35A-8-1004. Duties of office.**

The office shall:

- (1) coordinate state activities designed to reduce poverty;
  - (2) encourage entities in the private sector to participate in efforts to ameliorate poverty in the community;
  - (3) cooperate with agencies of local, state, and the federal government in reducing poverty and implementing community, social, and economic programs;
  - (4) receive and expend funds for the purposes outlined in this part;
  - (5) enter into contracts with and award grants to public and private nonprofit agencies and organizations;
  - (6) develop a state plan based on needs identified by community action agencies and community action statewide organizations;
  - (7) designate community action agencies to receive funds through the Community Services Block Grant program;
  - (8) fund community action agencies and community action statewide organizations;
  - (9) make rules in conjunction with the division in accordance with Title 63G, Chapter 3, Utah Administrative Rulemaking Act, to carry out the purposes of this part;
  - (10) provide assistance to local governments or private organizations for the purpose of establishing and operating a community action agency;
  - (11) provide technical assistance to community action agencies to improve program planning, program development, administration, and the mobilization of public and private resources;
  - (12) convene public meetings that provide citizens the opportunity to comment on public policies and programs to reduce poverty;
  - (13) advise the governor and Legislature of the nature and extent of poverty in the state and make
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- recommendations concerning changes in state and federal policies and programs;
- (14) encourage Utah's nonprofit humanitarian assistance agencies serving low-income persons by facilitating, coordinating, training, and providing technical assistance to address the needs of Utah's low-income persons by enhancing management, improving service and program delivery, facilitating partnerships, and preserving flexibility and local initiative;
  - (15) develop and implement management goals that fulfill the Community Services Block Grant mission, state requirements, and the mandates of federal legislation;
  - (16) prepare a Community Services Block Grant plan that contains provisions describing how the state will carry out the assurances of the Community Services Block Grant Act;
  - (17) act as the state agency responsible for the evaluation and improvement of emergency food assistance services in the state;
  - (18) monitor the impact of social policies on the emergency food network;
  - (19) provide training and technical assistance to grantees to assist their:
    - (a) program development and implementation;
    - (b) compliance with state and federal regulations; and
    - (c) reporting and management information systems;
  - (20) make the distributions required by Section [35A-8-1009](#); and
  - (21) administer other programs to alleviate poverty that are assigned to the office.
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#### Title 35A Chapter 8 Section 1005

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#### **35A-8-1005. Distribution of Community Services Block Grant funds.**

Community Services Block Grant funds received by the office shall be distributed as follows:

- (1) 90% to community action agencies;
  - (2) 5% to:
    - (a) organizations with a statewide focus to accomplish specific objectives that complement the Community Services Block Grant poverty programs;
    - (b) provide training and technical assistance for grantees of Community Services Block Grant funds; or
    - (c) supplement anti-poverty projects; and
  - (3) 5% to reimburse costs incurred by the office in administration of this part.
-

**35A-8-1006. Evaluations -- Reports.**

- (1) The office shall periodically evaluate grantees of Community Services Block Grant funds as established by rule by the division in accordance with Title 63G, Chapter 3, Utah Administrative Rulemaking Act.
  - (2) A grantee of Community Services Block Grant funds shall submit to the office a year-end report, covering a reporting period consistent with the federal fiscal year, which provides an account of the grantee's programs operated with or supported by Community Services Block Grant funds, including:
    - (a) the types of programs operated by the grantee;
    - (b) the outcome of each program;
    - (c) the number of persons served by each program;
    - (d) the number of times service was given by each program; and
    - (e) an accounting of the Community Services Block Grant funds expended by the grantee.
  - (3) The office shall report annually to the appropriate legislative appropriations subcommittee on the distribution and expenditure of Community Services Block Grant funds.
- 

**35A-8-1007. Program development by grantees.**

Grantees of Community Services Block Grant funds shall develop specific programs and goals, consistent with the Community Services Block Grant Act, designed to provide the most effective solutions to the problems of poverty identified in their communities within the constraints of available funding, including projects related to:

- (1) employment;
  - (2) education;
  - (3) income management;
  - (4) housing;
  - (5) emergency assistance;
  - (6) nutrition;
  - (7) linkages and coordination with other programs;
  - (8) health; and
  - (9) self-sufficiency.
-

**35A-8-1008. Recognition of community action agencies.**

The office may:

- (1) recognize eligible organizations as community action agencies;
  - (2) withdraw the recognition or terminate funding of a designated community action agency for cause, as established by rule made by the division in accordance with Title 63G, Chapter 3, Utah Administrative Rulemaking Act; and
  - (4) change the boundaries and the number of recognized community action agencies, provided that the governing board of each affected community action agency concurs in the action.
- 

Renumbered and Amended by Chapter 212, 2012 General Session

[http://le.utah.gov/code/TITLE35A/htm/35A08\\_100100.htm](http://le.utah.gov/code/TITLE35A/htm/35A08_100100.htm)

**Attachment III – Notice of Public Comment Period**

**Order Confirmation for Ad #0000970935-01**

<b>Client</b>	UTAH DEPARTMENT OF WORKFORCE SERVICES	<b>Payor Customer</b>	UTAH DEPARTMENT OF WORKFORCE SERVICES
<b>Client Phone</b>	801-538-8722	<b>Payor Phone</b>	801-538-8722
<b>Account#</b>	9001444299	<b>Payor Account</b>	9001444299
<b>Address</b>	140 E 300 S 4TH FLR SALT LAKE CITY UT 84111 USA	<b>Payor Address</b>	140 E 300 S 4TH FLR SALT LAKE CITY UT 84111
<b>Fax</b>		<b>Ordered By</b>	<b>Acct. Exec</b>
<b>EMail</b>	sfeatherstone@utah.gov	Sheryl	kstowe

Ad Content Proof Actual Size



**Notice of Public Hearing**

The State Community Services Office will hold a public hearing on Friday July 25, 2014 from 9:00 a.m. to 11:00 a.m. to present the State Plan for the Community Services Block Grant (CSBG) for federal fiscal year 2015 and 2016. The public hearing will be held at Department of Workforce Services, 1385 South State Street, 1st Floor, Conference Room 137A, Salt Lake City, UT. Copies of the State Plan and proposed uses of CSBG funds may be obtained by calling (801)468-0116 or by visiting the State Community Services Office Website at <http://csbg.utah.gov/csbg>. Public comments on the plan will also be accepted until 5:00 p.m. on Friday August 8, 2014. The comments may be sent to Department of Workforce Services, State Community Services Office, Attn: State CSBG Plan, 1385 South State Street, 4th Floor, Salt Lake City, UT 84115, 970995 **UPAXLP**

<b>Total Amount</b>	<b>\$80.60</b>			
<b>Payment Amt</b>	<b>\$0.00</b>			
<b>Amount Due</b>	<b>\$80.60</b>	<b>Tear Sheets</b>	<b>Proofs</b>	<b>Affidavits</b>
		0	0	0

**Payment Method** PO Number RFP State Plan

**Confirmation Notes:**

**Text:** Sheryl

<b>Ad Type</b>	<b>Ad Size</b>	<b>Color</b>
Legal Liner	1.0 X 45 Li	<NONE>

<b>Product</b>	<b>Placement</b>	<b>Position</b>
Salt Lake Tribune::	Legal Liner Notice - 0998	Request for Proposal
<b>Scheduled Date(s):</b>	7/18/2014	
<b>Product</b>	<b>Placement</b>	<b>Position</b>
Deseret News::	Legal Liner Notice - 0998	Request for Proposal
<b>Scheduled Date(s):</b>	7/18/2014	
<b>Product</b>	<b>Placement</b>	<b>Position</b>
utahlegals.com::	utahlegals.com	utahlegals.com
<b>Scheduled Date(s):</b>	7/18/2014	

**Attachment IV – Legislative Hearing Agenda and Minutes**

**MINUTES OF THE  
ECONOMIC DEVELOPMENT AND WORKFORCE SERVICES INTERIM COMMITTEE**

Wednesday, September 18, 2013 – 2:00 p.m. – Room 20 House Building

**Members Present:**

Sen. Aaron Osmond, Senate Chair Rep.  
Rebecca P. Edwards, House Chair Sen.  
Patricia W. Jones Sen. Stuart C. Reid  
Sen. Brian E. Shiozawa Sen. Jerry W.  
Stevenson Rep. Jim Bird Rep. Rich  
Cunningham Rep. Lynn N. Hemingway  
Rep. Bradley G. Last Rep. Ronda Rudd  
Menlove

Rep. Kraig Powell  
Rep. Angela  
Romero Rep. Dean  
Sanpei Rep. Brad  
R. Wilson

**Staff Present:**

Mr. Benjamin N. Christensen, Policy  
Analyst Mr. Peter L. Asplund, Associate  
General Counsel Ms. Debra Hale,  
Legislative Secretary

**Note:** A list of others present, a copy of related materials, and an audio recording of the meeting can be found at [www.le.utah.gov](http://www.le.utah.gov).

**1. Committee Business**

Chair Edwards called the meeting to order at 2:17 p.m.

**MOTION:** Rep. Bird moved to approve the minutes of the July 17, 2013, meeting. The motion passed unanimously. Rep. Cunningham was absent for the vote.

**2. Single Audit Management Letter Findings**

Mr. Geoffrey Landward, Deputy Director, Department of Workforce Services (DWS), reviewed the department's report on the Utah State Auditor's annual Department of Workforce Services Single Audit Management Letter by addressing single audit errors and highlighting some of the department's successes. Mr. Landward addressed ways the department is making efforts to improve on the findings of the audit and made recommendations to prevent these issues from recurring.

Mr. Nathan Harrison, Director of Internal Audit, Department of Workforce Services, informed the committee that encouraging results have occurred and that there has been a significant reduction in the error rate.

**3. Housing and Community Development Programs**

Mr. Gordon D. Walker, Director, Housing and Community Development Division, Department of Workforce Services, referred to his handout "Housing and Community Development Division," which outlined the division and its operations and functions. He stated that the division administers the Permanent Community Impact Fund, the Olene Walker Housing Fund, and several other programs to serve local government, community organizations, and citizens. Mr. Walker added that the division assists communities with the provisions of infrastructure, bonding ability, affordable housing, and basic community services, and assists with community problems, including hunger, homelessness, and home heating. He added that most of the division's programs are overseen by a board that administers grants,

loans, and investments. He then introduced key employers in the division to the committee.

Referring to the last two pages of his handout "2012 Monument Valley Housing and Weatherization Project," Mr. Walker concluded by inviting committee members to fly down with the HCDD to visit this impressive program.

**MOTION:** Rep. Wilson moved to direct committee staff to prepare legislation for unemployment insurance amendments recommended by the DWS. The motion passed unanimously. Rep. Cunningham was absent for the vote.

#### **4. Tourism Marketing Performance Account – Briefing**

Mr. Spencer P. Eccles, Executive Director, Governor's Office of Economic Development (GOED), thanked the committee for its support and reviewed a trip he took with the governor and lieutenant governor to Richfield, Utah, for a Governor's Rural Partnership Board meeting. Mr. Eccles spoke of his appreciation that the board was able to collaborate with the Office of Tourism and Film and subsequently see effective results.

Ms. Vicki Varela, Managing Director, Utah Office of Tourism and Film, recognized members of the office in attendance. She reported on the "63M-1-1406. Tourism Marketing Performance Account," which was included in the meeting packet and provides that a portion of the state sales and use tax revenue is deposited for statewide advertising, marketing, and a branding campaign for promotions of the state by the office. Ms. Varela stated that the amount set aside for the account was \$12 million for FY 2014 and that the annual increases built into the statutory formula are due to expire after FY 2016, which will cap the annual amount going into the account at \$18 million beginning in FY 2017.

Ms. Varela then reviewed a visual presentation describing how Utah tourism is being positively affected by the office's efforts.

As illustrated though a video clip, Ms. Varela said that Utah tourism spending experienced unprecedented growth in 2012. Commenting on Prosperity 20/20, the largest group of business leaders, community officials, and chambers ever assembled to address the issues and effects of education in the state of Utah, Ms. Varela stressed that education is essential to continue the success of the office and that tourism contributes a significant amount to the state tax base.

Ms. Varela reviewed her handout "BEER – 2012 Utah Tourism at a Glance" and stressed the need for additional funding. She said that the office would like to get into cable advertising to extend air time. She stated that the office is excitedly looking into ways to get into more national and international markets and concluded that, in order to get more tourists to visit, the state needs to offer additional flights and easier access to alcoholic beverages.

**MOTION:** Sen. Osmond moved to direct staff to obtain information from the Utah Office of Tourism and develop possible recommendations for the Tourism Marketing Performance Account. The motion passed unanimously.

Mr. Joel Racker, Chair, Board of Tourism Development, Governor's Office of Economic Development, stated that the committee is very engaged with the state's federal delegation to work on visa waivers, including studying how easy the waivers are to get and how long the visits are available.

Rep. Spencer J. Cox applauded the changes that GOED is making with tourism involving rural Utah. He said he is excited to report that rural counties are coming together, talking to local residents, and encouraging them to rediscover the beauty of this state, which would benefit these regions with in-state tourist money.

Ms. Tara Rollins, Executive Director, Utah Housing Coalition, addressed the issue of service employees, such as chamber maids, who require low-income housing to stabilize themselves as they serve Utah tourists.

#### **5. Unmanned Aerial Systems (UAS) Manufacturing Potential**

Mr. Vincent Mikolay, Managing Director, Business Outreach and International Trade, Governor's Office of Economic Development, briefed the committee on the use of UAS for military and commercial purposes. He explained the potential for research and development opportunities and a manufacturing growth industry and said that Utah is pursuing the economic development opportunities of UAS and related business activities.

In his visual presentation "Unmanned Aerial Vehicle Industry in Utah," Mr. Mikolay discussed ways the GOED is working to expand international strategy to invest in the state. He said that Mr. Marshall Wright, a public sector employee, is working hard to bring this new UAS industry to Utah.

#### **6. Community Development and Renewal Agencies**

Mr. Asplund referred to his handout and visual presentation "Community Development and Renewal Agencies, a Brief Overview" and showed that the agencies are created at county and city levels to undertake or promote urban renewal, economic development, or community development through tax-increment financing, which allows property tax collected for a project area in excess of a base-year tax amount to be paid directly to the agency for an extended period of time instead of to traditional taxing entities. He discussed with the committee the impact of lost revenue on taxing entities such as school districts.

Mr. Nick Duerksen, Economic Development Director, Sandy City, stated that whenever the city is participating in a project area, it completes effective, comprehensive feasibility studies. He said that these studies have been useful to justify funds that have been used to provide infrastructure for projects.

Mr. Walker stated that the housing portion has been taken out of the Community Development Area program, so it no longer has to deal with affordable housing. He said that this is a case where economic development has overrun the need for housing, and housing is trying to keep up. He continued that it is less of an issue now, because the communities have substantial amounts of money in the systems, and the Housing and Community Development Division is working to assist them in creating affordable housing to meet the needs in those communities.

Chair Edwards relinquished the chair to Sen. Osmond.

Ms. Cathy Dudley, Minimum School Program Budget and Property Tax Specialist, Utah State Office of Education, referred to her visual presentation "Community Development and Renewal Agencies." She addressed the intent of community redevelopment, the tax increment involved, and described the makeup of the Taxing Entity Committee and renewal agencies and their impact on public education. To illustrate these points, Ms. Dudley gave the example of South Jordan City, and she provided a list of the criteria required to approve these projects.

Mr. Steve Erickson, Consultant, Crossroads Urban Center, informed the committee that a study of the affordable housing component of redevelopment agencies and their projects in Salt Lake County was done a couple of years ago, and the analysis is available at [www.bonnevilleresearch.com](http://www.bonnevilleresearch.com) as a resource to the committee.

#### **7. Legislative Hearing for the Community Services Block Grant Program**

Ms. Tamera Kohler, Director, State Community Services Office, Housing and Community Development Division, Department of Workforce Services, provided the committee with information on a federal legislative hearing required once every three years in conjunction with the development of the State Plan for the Community Services Block.

Ms. Gina Corning, Executive Director, Utahns Against Hunger (UAH), stated that UAH receives funding to work statewide with emergency food pantries. She informed the committee that 20% of households in the state struggle to provide food for their families. She concluded that UAH also provides services such as rental assistance, job training, and writing of resumes.

Mr. Craig Hall, Sr., General and Legal Counsel, Salt Lake Community Action Program (SLCAP), stated that SLCAP is the largest community action program in the state. He expressed concern with the allocation process and emphasized that SLCAP supports the other eight agencies in the state in assisting people in great need. He said that the state plan, as submitted, has not followed the applicable community service block grant rules and regulations.

Mr. Hall informed the committee that the poverty rate in Salt Lake and Tooele Counties has increased, yet SLCAP will receive less funding. He stated that policy stipulates that an agency's funding will not be reduced unless there is: 1) a reduction of poverty level in the service area of the agency; 2) a designation of a new agency; or 3) the nonperformance of an agency. Mr. Hall said that, since SLCAP does not meet any of these criteria, committee members should request the state community service office hold further discussions with the Utah Community Action Partnership and other partners in this program.

#### **8. Other Committee Business/Adjourn**

**MOTION:** Rep. Bird moved to adjourn the meeting. The motion passed unanimously. Sen. Jones, Rep. Hemingway, Rep. Last, and Rep. Powell were absent for the vote.

Chair Osmond adjourned the meeting at 5:03 p.m.

**Attachment V -- Certifications**

## **CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS**

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -  
Primary Covered Transactions

### Instructions for Certification

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.

2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.

3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.

5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.

6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.

7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant

may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

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#### Certification Regarding Debarment, Suspension, and Other Responsibility Matters - - Primary Covered Transactions

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;

(b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

#### Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - - Lower Tier Covered Transactions

#### Instructions for Certification

1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.

2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other

remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.

4. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.

5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.

6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

9. Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

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#### Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - - Lower Tier Covered Transactions

(1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared

ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.

(2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

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Signature and Date

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Printed Name

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Title

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Organization

## CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

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This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645 (a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

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### Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. For grantees other than individuals, Alternate I applies.
4. For grantees who are individuals, Alternate II applies.
5. Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).
7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

*Controlled substance* means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

*Conviction* means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

*Criminal drug statute* means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

*Employee* means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

#### Certification Regarding Drug-Free Workplace Requirements

##### Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about - -
  - (1) The dangers of drug abuse in the workplace;
  - (2) The grantee's policy of maintaining a drug-free workplace;
  - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -
  - (1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

(B) The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

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Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

(a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;

(b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR 21690, 21702, May 25, 1990]

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Signature and Date

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Printed Name

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Title

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Organization

**CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE**

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

The applicant/grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for the children's services and that all subgrantees shall certify accordingly.

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Signature and Date

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Printed Name

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Title

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Organization

## CERTIFICATION REGARDING LOBBYING

### Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

\_\_\_\_\_  
Signature and Date

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Organization

**Attachment VI – Poverty Guidelines**

**Department of Health and Human Services  
2014 Poverty Guidelines**

<b>Persons in Family Or Households</b>	<b>100% of Poverty</b>	<b>125% of Poverty</b>	<b>150% of Poverty</b>
1	\$11,670	\$14,588	\$17,505
2	\$15,730	\$19,663	\$23,595
3	\$19,790	\$24,738	\$29,685
4	\$23,850	\$29,813	\$35,775
5	\$27,910	\$34,888	\$41,865
6	31,970	\$39,963	\$47,955
7	\$35,030	\$45,038	\$54,045
8	\$40,090	\$50,113	\$60,135
*Families with more than 8 persons	(100% add \$4,060)	(125% add \$5,075)	(150% add \$6,090)

**Attachment VII – CSBG Model Plan States and Territories FFY 2015**

# OFFICE OF COMMUNITY SERVICES

An Office of the Administration for Children & Families

## CSBG Model Plan States and Territories FY 2015

Published: June 4, 2014

Audience: Community Services Block Grants (CSBG)

Category: Guidance, Policies, Procedures, Model Plan

### Outline for Model CSBG Application

#### I. Federal Fiscal Year or Years Covered by this State Plan and Application

Please specify the Federal fiscal year or years covered by this plan.

FFY \_\_\_\_ only

FFY \_\_\_\_ and FFY \_\_\_\_

**II. Letter of Transmittal** - Cover letter to the Director, Office of Community Services; include the CSBG Program Contact Person, the State CSBG Official who is to receive the CSBG Grant Award with complete addresses, telephone and fax numbers.

#### III. Executive Summary

**A. CSBG State Legislation** - Describe and provide a reference for the State's statutory authority for the Community Services Block Grant Program.

#### B. Designation of Lead State Agency to Administer the CSBG Program

Section 676(a) of the Act requires the Chief Executive of each State designate an appropriate State agency to act as lead agency for administration of the Community Services Block Grant. (Include letter of designation)

Designated State Lead Agency \_\_\_\_\_

Director/Administrator of Designated State Agency \_\_\_\_\_

OMB Control Number: 0970-0382

Expiration Date: 08/31/2016

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13)

Public reporting burden for this collection of information is estimated to average 10 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

#### C. Public Hearing Requirements

Describe and provide documentation on how the State complied with legislative hearing requirements of the CSBG Act regarding the State Application and Plan, as follows:

(1) **Public Hearing:** Specify the date of the public hearing held by the designated lead agency for the current State plan and describe the statewide distribution of notice of such hearing required under Section 676(a)(2)(B) of the Act.

(2) **Legislative Hearing:** Specify the date of the last legislative hearing held in conjunction with Section 676(a)(3) of the Act, which requires each State to hold as least one legislative hearing every three years in conjunction with the development of the State plan.

(3) **Public Inspection of State Plan:** Describe how the State made available for public inspection and comment the current State plan or revision to the State plan. (Section 676(e)(2) of the Act requires each State to make available to the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan.)

#### IV. Statement of Federal and CSBG Assurances (which includes programmatic, administrative, financial and certifications)

As part of the annual or biannual application and plan required by Section 676 of the Community Services Block Grant Act, as amended, (42 U.S. C. 9901 et seq.) (The Act), the designee of the chief executive of the State hereby agrees to the Assurances in Section 676 of the Act - by signature at end

of this section.

#### A. Programmatic Assurances

- (1) Funds made available through this grant or allotment will be used:
- (a) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families to enable the families and individuals to:
    - (i) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
    - (ii) secure and retain meaningful employment;
    - (iii) attain an adequate education, with particular attention toward improving literacy skills of low-income families in the communities involved, which may include carrying out family literacy initiatives;
    - (iv) make better use of available income;
    - (v) obtain and maintain adequate housing and a suitable living environment;
    - (vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
    - (vii) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;
  - (b) To address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after-school child care programs; and
  - (c) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [676(b)(1)]
- (2) To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in Section 675C(b) of the Act in accordance with the community services block grant program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant program; [676(b)(2)]
- (3) To provide information provided by eligible entities in the State, including:
- (a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 675C(a) of the Act, targeted to low-income individuals and families in communities within the State;
  - (b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
  - (c) a description of how funds made available through grants made under Section 675(a) will be coordinated with other public and private resources; and,
  - (d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [676(b)(3)]
- (4) To ensure that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals. [676(b)(4)]
- (5) That the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998; [676(b)(5)]
- (6) To ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such communities. [676(b)(6)]
- (7) To permit and cooperate with Federal investigations undertaken in accordance with section 678D of the Act. [676(b)(7)]

- (8) That any eligible entity in the State that received funding in the previous fiscal year through a community services block grant under the community services block grant program will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b) of the Act. [676(b)(8)]
- (9) That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations. [676(b)(9)]
- (10) To require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation. [676(b)(10)]
- (11) To secure from each eligible entity in the State, as a condition to receipt of funding, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community- needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs; [676(b)(11)]
- (12) That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b) of the Act. [676(b)(12)]
- (13) To provide information describing how the State will carry out these assurances. [676(b)(13)] (This is the Narrative CSBG State Plan. See section V. for detailed "how to" instructions. )

#### **B. Administrative and Financial Assurances**

The State further agrees to the following, as required under the Act:

- (1) To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the community services block grant program prepared in accordance with and containing the information described in Section 676 of the Act. [675A(b)]
- (2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the community services block grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. [675C(a)(1) and (2)]
- (3) In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when unobligated funds exceed 20 percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the community services block grant program. [675C (a)(3)]
- (4) To spend no more than the greater of \$55,000 or 5 percent of its grant received under Section 675A or the State allotment received under section 675B for administrative expenses, including monitoring activities. [675C(b)(2)]
- (5) In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675(c) regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. [675(c)]
- (6) That the lead agency will hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or 675B for the period covered by the State plan. [676(a)(2)(B)]
- (7) That the chief executive officer of the State will designate, an appropriate State agency for purposes of carrying out State community services block grant program activities. [676(a)(1)]
- (8) To hold at least one legislative hearing every three years in conjunction with the development of the State plan. [676(a)(3)]
- (9) To make available for the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan. [676(e)(2)]

**(10) To conduct the following reviews of eligible entities:**

- (a) full onsite review of each such entity at least once during each three-year period;
- (b) an onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the community services block grant program;
- (c) follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State;
- (d) other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the community services block grant program) terminated for cause. [678B(a)]

**(11) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan, to provide services under the community services block grant program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:**

- (a) inform the entity of the deficiency to be corrected;
- (b) require the entity to correct the deficiency;
- (c) offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
- (d) at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved;
- (e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. [678(C)(a)]

**(12) To establish fiscal controls, procedures, audits and inspections, as required under Sections 678D(a)(1) and 678D(a)(2) of the Act.****(13) To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the community services block grant program. [678D(a)(3)]****(14) To participate, by October 1, 2001, and ensure that all-eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System [678E(a)(1)].****(15) To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under 678E(a)(2) of the Act.****(16) To comply with the prohibition against use of community services block grant funds for the for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in Section 678F(a) of the Act.****(17) To ensure that programs assisted by community services block grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. [678F(b)]****(18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with community services block grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. [678F(c)]****(19) To consider religious organizations on the same basis as other non-governmental organizations to provide assistance under the program so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment to the Constitution; not to discriminate against an organization that provides assistance under, or applies to provide assistance under the community services block grant program on the basis that the organization has a religious character; and not to require a religious organization to alter its form of internal government except as provided under Section 678B or to remove religious art, icons, scripture or other symbols in order to provide assistance under the community services block grant program. [679]****C. Other Administrative Certifications**

The State also certifies the following:

(1) To provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of community services block grant program funds.

(2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee.. The State further agrees that it will require the language of this certification be included in any subawards, which contain provisions for children's services and that all subgrantees shall certify accordingly.

"Signature (indicates the sign off of assurances in previous Section IV)"

-----  
Administrator/Director of Designated Lead Agency Date

## V. The Narrative State Plan ("How To Develop" Instructions)

Provide the following information, as outlined below:

### A. Administrative Structure

#### (1) State Administrative Agency

(a) Outline the mission and responsibilities of the lead agency designated to administer the State's community services block grant program.

(b) Goals and Objectives: Outline the goals and objectives of the lead agency that administers the State's community services block grant program.

#### (2) Eligible Entities

(a) Provide a list of eligible entities and

(b) Show geographic areas served.

#### (3) Distribution and Allocation of Funds

(a) Planned Distribution of Funds for Current Fiscal Year

### B. Description of Criteria and Distribution Formula

Describe criteria and distribution formula for allocation of CSBG funds to eligible entities. Describe limitations on funding and procedures for use of carry-over balances.

### C. Description of Distribution and Use of Restricted Funds

Show the planned distribution of restricted funds allocated under Section 675C(a) of the Act to eligible entities and provide a description of how funds will be used by eligible entities to further the stated purposes of the CSBG for the fiscal year or years covered by this plan. Beginning with FY 2000, identify and describe instances where funds have been recaptured and redistributed, as allowed under Section 675C(a)(3) of the Act.

### D. Description of Distribution and Use of Discretionary Funds

Show how the State plans to use discretionary funds made available from the remainder of the grant, as described in Section 675C(b) of the Act, (excluding administration) for the fiscal year or years covered by this plan. Include a description of how the State will support innovative community and neighborhood-based initiatives.

### E. Description of Use of Administrative Funds

Section 675(b)(2) of the Act specifies that no State may use more than the greater of \$55,000, or 5 percent of its grant or allotment for administrative expenses, including monitoring activities. Describe and provide a breakdown of planned State administrative expenses for the fiscal year or years covered by this plan. Specify use of CSBG funds for the State's Charity Tax Credit Program, if applicable.

### F. State Community Services Program Implementation

(1) Program Overview: Describe the following using information provided to the State by eligible entities, as required under Section 676(b)(2) of the Act:

#### (a) The Service Delivery System

A description of the service delivery system for services provided or coordinated with funds made available through grants made to eligible entities with restricted funds, targeted to low-income individuals and families in communities within the State. Include a description of the geographical area served and a listing of eligible entities (grantees) and service areas.

**(b) Linkages**

A description of how linkages will be developed by local entities to fill identified gaps in services, through the provision of information, referrals, case management, and follow up consultations.

**(c) Coordination with Other Public and Private Resources**

A description of how funds made available through grants to eligible entities will be coordinated with other public and private resources.

**(d) Innovative Community and Neighborhood-based Initiatives**

A description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the CSBG, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting.

**(2) Community Needs Assessments**

Describe how the State will comply with the following assurance in '676(b)(11): The State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.

Information describing how the State will carry out this assurance:

**(3) Tripartite Boards:**

Section 676B of the Act requires that, in order for a private non-profit entity or public organization to be considered to be an eligible entity for the purposes of the community services block grant program, it must administer the community services block grant program through a tripartite board or another mechanism specified by the State, whose members are chosen in accordance with democratic selection procedures to assure that not fewer than 1/3 of its members are representative of low-income individuals and families in the neighborhood served; reside in the neighborhood served; and are able to participate actively in the development, planning, implementation, and evaluation of the program to serve low-income communities.

Describe State policies and procedures to ensure this requirement is met:

**(4) State Charity Tax Program:**

If there is in effect under State law a charity tax credit program: (a) specify the amount of the contribution to the charity tax credit program from the community services block grant program; and (b) describe how the State will ensure that such funds will ensure that benefit only qualified charities that primarily assist poor individuals, as defined under Section 675C of the Act.

Information describing how the State will carry out this requirement:

**(5) Programmatic Assurances**

Describe how each of the assurances outlined in Section 676(b) of the CSBG Act will be carried out, as follows:

**(a) Assurance '676(b)(1) :**

Funds made available through the grant or allotment will be used:

**(1)** To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families to enable families and individuals to:

(i) remove obstacles and solve problems that block the achievement self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);

(ii) secure and retain meaningful employment;

(iii) attain an adequate education, with particular attention toward improving literacy skills of low-income families in the communities involved, which may include carrying out family literacy initiatives;

(iv) make better use of available income;

(v) obtain and maintain adequate housing and a suitable living environment;

(vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and

(vii) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts.

**(2)** To address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and

collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after-school child care programs; and

(3) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts).

Information describing how the State will carry out this assurance. (Include a description of how these activities will enable families and individuals to achieve the objectives described in subsections i to vii above).

(b) Assurance '676(b)(4): Eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.

Information describing how the State will carry out this assurance:

(c) State Assurance '676(b)(5): and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998.

Information describing how the State will carry out this assurance. (Include a description of how the State and eligible entities will coordinate the provision of employment and training activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998).

(d) Assurance '676(b)(6): The State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such communities.

Information describing how the State will carry out this assurance:

(e) Assurance '676(b)(9): The State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.

Information describing how the State will carry out this assurance:

## G. Fiscal Controls and Monitoring

(1) State Program Monitoring: Describe the lead agency's plans for conducting the following reviews of eligible entities, as required under Section 678B(a) of the Act:

- (a) a full onsite review of each such entity at least once during each 3-year period;
- (b) an onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the community services block grant program;
- (c) follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State;
- (d) other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the community services block grant program) terminated for cause.
- (e) Specify the date of the last audit conducted and the period covered by the audit for each eligible entity.

(2) Corrective Action, Termination and Reduction of Funding:

Describe the State's plan for complying with the requirements of Section 678C of the Act. (Section 678C of the Act requires states to comply with certain requirements in the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan, to provide services under the community services block grant program or to meet appropriate standards, goals, and other requirements established by the State, including performance objectives)

(3) Fiscal Controls, Audits, and Withholding:

Describe the State's systems of fiscal controls, procedures, and plans for audits and inspections, as required under Sections 678D(a)(1) and 678D(a)(2) of the Act. (4) Assurances: Describe how each of these assurances, outlined in Section 676(b) of the Act, will be carried out, as follows:

(a) The assurance '676(b)(7): The State will permit and cooperate with Federal investigations undertaken in accordance with section 678D of the Act.

Information describing how the State will carry out this assurance:

(b) The assurance '676(b)(8): Any eligible entity in the State that received funding in the previous fiscal year through a community services block grant under the community services block grant program will not have its funding terminated or reduced below the proportional share

of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b) of the Act.

Information describing how the State will carry out this assurance:

(c) The assurance '676(b)(10): The State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.

Information describing how the State will carry out this assurance:

## H. Accountability and Reporting Requirements

### (1) Results Oriented Management And Accountability:

Describe how the State will comply with the following assurance, in '676(b)(12) of the Act: The State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System or another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b) of the Act. (Include a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization) These measures must measure performance towards meeting the following stated National Goals of the Community Services Block Grant Program:

Goal 1 Low-income people become more self-sufficient (self-sufficiency).

Goal 2 The conditions in which low-income people live are improved (community revitalization).

Goal 3 Low-income people own a state in their community.

Goal 4 Partnerships among supporters and providers of services to low-income people are achieved.

Goal 5 Agencies increase their capacity to achieve results.

Goal 6 Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems. (family stability)

(2) Annual Report: Section 678E(a)(2) of the Act requires each State to prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities. In order to address with Congressional reporting requirements under Section 678E of the Act, this report must include at a minimum information that is pertinent and comprehensive, and which describes in detail CSBG activities and services as well as addresses outcomes which measure how CSBG funds were used to promote self-sufficiency, family stability, and community revitalization.

Use the following outline to report on CSBG services and activities and outcome measurements for the prior fiscal year:

#### (a) Performance Objectives

#### (b) Program Accomplishments and Activities

#### (c) Comparison of Planned and Actual Expenditures for Prior Fiscal Year

(1) Planned Distribution of Funds to Eligible Entities (as shown in previous State plan) vs. Actual Expenditures

(Note: Beginning in FY 2000: Were any funds recaptured and redistributed? If so, please describe).

(2) Planned Distribution of Funds for Discretionary Purposes (as shown in previous State plan) vs. Actual Expenditures

(3) Planned Use of Funds for State Administration (as shown in previous State plan) vs. Actual Expenditures

#### (d) Profile of Participants Served (Number and characteristics of clients served)

#### (e) Statistical Report on CSBG Program Services

Education

Emergency Services

Health

Housing

Income Management

Linkages

Nutrition

Economic Development

Self-sufficiency

Special/Innovative Programs

#### (f) Training and Technical Assistance Provided by the State

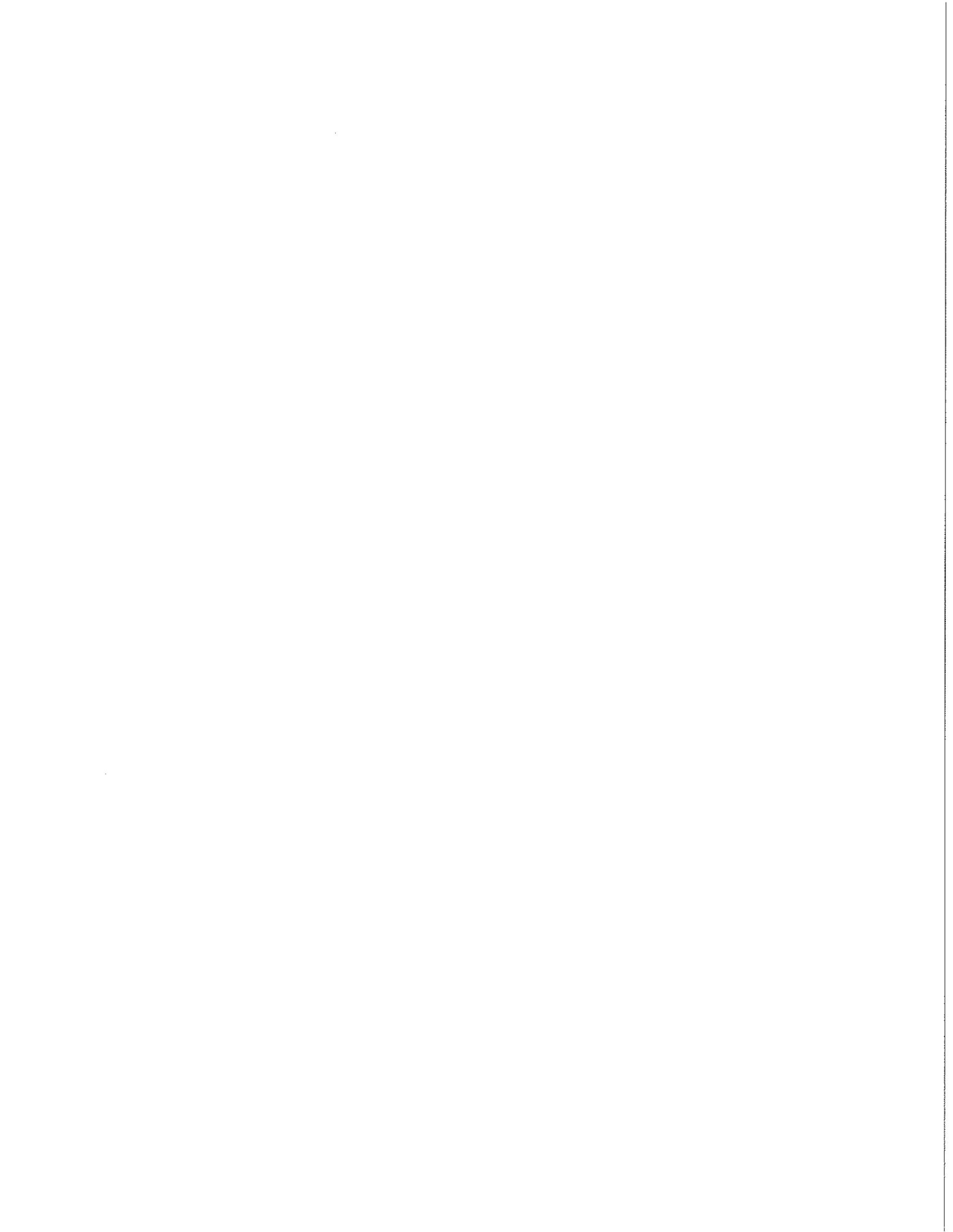
## VI. Appendices

### A. Documentation of Legislative and Public Hearings

(Include copies of public notices, letters, newspaper articles, etc.,)

**B. Additional Data or Information(as needed)**

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**COMMUNITY SERVICES  
BLOCK GRANT PROGRAM**

U.S. Department of Health and Human Services  
Administration for Children and Families  
Office of Community Services  
Division of State Assistance  
370 L'Enfant Promenade, S.W.  
Washington, D.C. 20447

**Information Memorandum**

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**Transmittal No. 137**

**Date: July 7, 2014**

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**TO:** States and U.S. Territories

**SUBJECT:** Application for Fiscal Year (FY) 2015 Community Services Block Grant (CSBG) Funds Based on the Availability of CSBG Funds

**RELATED  
REFERENCES:**

Community Services Block Grant Act, Title VI, Subtitle B, of the Omnibus Budget Reconciliation Act of 1981, Public Law 97-35, as amended; Human Services Amendments of 1994, P.L.103-252; the FY 1996 CSBG Appropriation Legislation, P.L.104-134; CFR Title 45, Part 96; Coats Human Services Reauthorization Act of 1998, P. L. 105-285; Department of Health and Human Services Block Grant Regulations and Current Poverty Income Guidelines.

**PURPOSE:** To inform States and U.S. Territories of the CSBG application requirements for FY 2015.

**BACKGROUND:** According to section 676(b) of the CSBG Act, States, including Territories, must prepare and submit an application and State plan for CSBG funding. The Office of Community Services (OCS) funds CSBG grantees based on the determination that their application and State plans are complete in accordance with all requirements of the CSBG Act. The State CSBG application and plan not only is a critical document for Federal monitoring and oversight purposes, but also provides a framework for accountability and oversight at the State level.

**SUBMISSION**

**REQUIREMENTS:** CSBG applications for FY 2015 are due to OCS by September 1, 2014. States have the option of submitting CSBG applications annually or bi-annually (covering one or two fiscal years). The format and requirements for FY 2015 applications are similar to those from FY 2014, as described in CSBG IM 133, dated June 20, 2013. However, applicants this year must submit their application and plans electronically through the Administration for Children and Families' (ACF) Online Data Collection System (OLDC).

**ONLINE  
SUBMISSION:**

October 1, 2013, ACF directed its program offices, including OCS, to require all mandatory grantees to submit applications electronically. (See [78 FR 60285-60286, October 1, 2013](#).) To meet this responsibility, starting in FY 2015, OCS requires States to use the OLDC system to submit data on the *Application for Federal Assistance SF-424 Mandatory* (SF-424M) and upload State plan documents. OCS will only consider applications to be official if they are submitted through the OLDC system. OCS will provide additional information and training on the OLDC system and the application submission process in the coming weeks.

As part of the new electronic submission requirement for FY 2015, a State must submit an electronic application (SF-424M) to receive CSBG funds. If a grantee submitted a two-year application for FYs 2014 and 2015, the grantee is still required to submit a SF-424M and their annual report through the OLDC system by September 1, 2014.

**APPLICATION  
AND STATE**

**PLAN CONTENTS:** Please see the CSBG Model State Plan, attached below, as an outline and guide. A complete CSBG application and State plan includes:

- (1) An electronic SF-424M: As described above, each State must complete and submit this form through the OLDC system. The form requires name and contact information for the CSBG State Designated Official (referred to as the authorizing official on the SF 424M) and the CSBG point of contact.
- (2) Assurances: Each application must contain assurances signed by the designee of the lead agency. Assurances should contain the language precisely as it appears in specific provisions of sections 675C; 676(a), (b) and (e); 678B; 678C; 678D; 678E; 678F; and 679 of the CSBG Act. (The complete list of 19 assurances is included in the Model State Plan.)
- (3) Certifications: Each application should include the required certifications regarding (1) Lobbying, (2) Drug-Free Workplace Requirements, (3) Debarment, and (4) Environmental Tobacco Smoke. Each certification must be signed by the designee of the lead agency. (Please see the certifications attachment.)
- (4) Audit requirements: In compliance with the Single Audit Act and section 678D of the CSBG Act, please indicate the date of the last audit undertaken and the period that the audit covers.
- (5) Documented evidence of public and legislative hearings: States should include documents that confirm that the State plan was

made available for public inspection and review as required by section 676(a)(2)(B) of the CSBG Act, and that the State conducted a legislative hearing at least once every three years in conjunction with development of the State plan, as required in section 676(a)(3).

- (6) State plan narrative: The State plan narrative should describe how the State will specifically carry out each of the required assurances. States should not assume any assurance is self-explanatory.

The plan should also include: (1) a goals and objectives statement, (2) the specific types of activities to be supported, (3) areas and categories of individuals to be served, and (4) the criteria and method used for the distribution of funds to the State's local eligible entities.

The narrative should detail the proposed use of CSBG funding, including the use of funds for (1) the CSBG 90 percent pass-through, (2) discretionary purposes, (3) training and technical assistance, and (4) administration.

Please refer to the CSBG Model State Plan for additional information about the State plan narrative.

- (7) Annual reporting requirement: Section 678E(a)(2) of the CSBG Act requires States to prepare and submit an annual report on the activities and performance of the State and State's eligible entities.

The statute specifies that the State's annual report should contain: (1) information on the measured performance of the State and eligible entities in promoting self-sufficiency, family stability, and community revitalization; (2) an accounting of the expenditure of CSBG funds, including those funds spent on administrative costs by the State and eligible entities; (3) an accounting of funds spent by the eligible entities on the direct delivery of local services; (4) information on the number of and characteristics of CSBG clients based on data collected from the eligible entities; (5) a summary of training and technical assistance offered by the State to eligible entities to correct deficiencies; and (6) summaries of the planned and actual uses of CSBG funds.

In past years, States may have fulfilled their annual reporting requirement by providing data to OCS's technical assistance provider for the CSBG Information Survey (IS). States may continue this practice, but must also submit their State report to OCS in order to meet statutory requirements.

For the FY 2015 application cycle, States have two options for providing their annual report to OCS:

1. Provide a written narrative annual report that meets all requirements of the CSBG Act signed by the State Designated Official or State CSBG point of contact. (States should submit the written report electronically through the OLDC system along with their State plan.); or
2. At least 15 days ahead of the September 1 application deadline, send an official letter to NASCSP, copied to OCS and signed by the State Designated Official or State CSBG point of contact, asking that NASCSP provide an electronic copy of the final approved CSBG IS State report directly to OCS. This will serve as the State's annual report. (States should include a copy of this letter electronically through the OLDC system along with their State plan.)

Please note, as described in the "Online Submission" section of this guidance, all States must submit an application and annual report through the OLDC system in FY 2015, including States that submitted a two-year State plan for FY 2014.

**ADDITIONAL  
INFORMATION:**

Waivers: In accordance with section 678F(a)(2) of the CSBG Act, OCS must approve waivers, in writing, before block grant funds can be used for capital improvement and construction purposes. If a State anticipates the need for a waiver, a waiver request may be submitted as a separate part of the FY 2015 application. Waiver requests must be submitted to OCS by the State, not the eligible entity. If you anticipate the need for a waiver request, such requests should address the requirements referenced in section 678F(a)(2) of the CSBG Act and OCS Information Memorandum 60 dated February 6, 2002.

Proportionate Share of Funding: States are required to provide each eligible entity, currently in good standing within the State, its proportionate share of any CSBG funding received by the State. A decision by a State not to provide a proportionate share in funding to an eligible entity will be considered as a reduction of funding under sections 676(b)(8) and 678C of the CSBG Act. Reduction of funding is subject to a public notice and hearing as directed in IM 116.

Collaboration with Faith-Based Organizations: States must provide an assurance (included in the Model State Plan as item IV.B.19) that is signed by the CSBG State Designated Official and addresses the requirements of section 679 of the CSBG Act, entitled "Operational Rule:"

"(a) Religious Organizations Included as Nongovernmental Providers. --

For any program carried out by the Federal Government, or by a State or local government under [the CSBG Act], the government shall consider, on the same basis as other non-governmental organizations, religious organizations to provide the assistance under the program, so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment of the Constitution. Neither the Federal Government nor a State or local government receiving funds under this subtitle shall discriminate against an organization that provides assistance under, or applies to provide assistance under, this subtitle, on the basis that the organization has a religious character.

“(b) Religious Character and Independence.

- (1) In General. – A religious organization that provides assistance under a program described in subsection (a) shall retain its religious character and control over the definition, development, practice, and expression of its religious beliefs.
- (2) Additional Safeguards. – Neither the Federal Government nor a State or a local government shall require a religious organization--
  - (A) To alter its form of internal governance, except (for purposes of administration of the community services block grant program) as provided in section 676B; or
  - (B) To remove religious art, icons, scripture, or other symbols; in order to be eligible to provide assistance under a program described in subsection (a).
- (3) Employment Practices. – A religious organization's exemption provided under section 702 of the Civil Rights Act of 1964 (42 U.S.C. 2000e-1) regarding employment practices shall not be affected by its participation in, or receipt of funds from, program described in subsection (a).

“(c) Limitations on Use of Funds for Certain Purposes. – No funds provided directly to a religious organization to provide assistance under any program described in subsection (a) shall be expended for sectarian worship, instruction, or proselytization.

“(d) Fiscal Accountability. –

- (1) In General. – Except as provided in paragraph (2), any religious organization providing assistance under any program described in subsection (a) shall be subject to the same regulations as other nongovernmental organizations to account in accord with generally accepted accounting principles for the use of such funds provided under such program.
- (2) Limited Audit. – Such organization shall segregate government funds provided under such program into a separate account. Only the government funds shall be subject to audit by the government.

- “(e) Treatment of Eligible Entities and Other Intermediate Organizations. – If an eligible entity or other organization (referred to in this subsection as an 'intermediate organization'), acting under a contract, or grant or other agreement, with the Federal Government or a State or local government, is given the authority under the contract or agreement to select nongovernmental organizations to provide assistance under the programs described in subsection (a), the intermediate organization shall have the same duties under this section as the government.”

**PERFORMANCE  
MANAGEMENT:**

OCS and the CSBG Network have made steady progress in recent years developing elements of a new accountability and performance management system for CSBG, including CSBG organizational standards, State and Federal accountability measures, and ROMA Next Generation measures. Each of these performance management elements will be critical to our future collective ability to measure effectiveness and efficiency and demonstrate results in meeting the anti-poverty goals of the CSBG Act.

The CSBG organizational standards will be the first completed component of this CSBG performance management system; OCS expects States to implement these standards, or an alternative set of standards, in FY 2016. While States do not need to include organizational standards in their FY 2015 applications, OCS encourages States to begin planning now for the official use and implementation of the CSBG organizational standards or alternative standards. The process for how each State will officially adopt the standards in their State will look different in each State.

Looking ahead to the FY 2016 application cycle, we expect to have a revised CSBG Model State Plan and additional tools and technical assistance to help States incorporate organizational standards into the application and State plan process.

**ADDITIONAL  
INFORMATION:**

OCS will host webinars on the FY 2015 CSBG application and State plan process. In the meantime, if you have questions or need additional information, please contact your assigned OCS CSBG program specialist. The list of OCS staff and contact information is posted on the OCS website at [www.acf.hhs.gov/programs/ocs/resource/csbg-staff-assignments-by-region](http://www.acf.hhs.gov/programs/ocs/resource/csbg-staff-assignments-by-region).

Thank you for your continued commitment to our collaborative work to address poverty in our communities.

/s/

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Jeannie L. Chaffin  
Director  
Office of Community Services

Related Information:

- [CSBG Model State Plan](#)
- [2014 HHS Poverty Guidelines](#)
- [Federal Certifications](#)

**Attachment IX – OCS Draft IM March 24, 2014**

# DRAFT

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## **COMMUNITY SERVICES BLOCK GRANT**

U.S. Department of Health and Human Services  
Administration for Children and Families  
Office of Community Services  
Division of State Assistance  
370 L'Enfant Promenade, S.W.  
Washington, D.C. 20447

### Information Memorandum

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Transmittal No. Draft

Date: March 24, 2014

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**TO:** State Community Services Block Grant (CSBG) Administrators, U. S. Territory CSBG Administrators, Eligible Entities, and State Community Action Associations

**SUBJECT:** Authorities and Expectations for State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42 U.S.C. § 9914

**RELATED REFERENCES:** Community Services Block Grant Act 42 U.S.C. § 9901 *et seq.*, hereafter referred to as “the CSBG Act.”

At this time, the Office of Community Services (OCS) is issuing this draft Information Memorandum (IM) providing guidance to the CSBG Network on the use of organizational standards by States. OCS will seek authority to pursue implementation of national organizational standards for CSBG via changes in legislative authority, but has determined that voluntary implementation by States does not need to be delayed. The development of organizational standards has been a collaborative process across the CSBG Network, and in that spirit, OCS is first providing this guidance in draft form to solicit feedback. Over the next month, OCS welcomes State CSBG Lead Agencies, eligible entities, State Community Action Associations, national partners, and any other interested parties to submit questions and comments in response to this draft IM. Feedback from the CSBG Network and others will allow OCS an opportunity to strengthen and clarify the guidance on this important subject before releasing a final IM. We appreciate the CSBG Network’s collaborative efforts to date, and ask for your input on this guidance by April 25, 2014. **Please submit your questions or comments via email to [LaToya.Smith@acf.hhs.gov](mailto:LaToya.Smith@acf.hhs.gov).**

### SUMMARY:

- The Office of Community Services (OCS) expects States to report on the establishment and implementation of organizational standards, no later than Fiscal Year 2016, in coordination with their local eligible entities, in order to increase accountability for CSBG-eligible entities.

- This comprehensive set of organizational standards, developed by the CSBG Organizational Standards Center of Excellence (COE), has been established to ensure that all CSBG eligible entities have the capacity to provide high-quality services to low-income individuals and communities.

The COE-developed organizational standards are organized into three thematic groups: maximum feasible participation, vision and direction, and operations and accountability. They are tailored for use by both private and public eligible entities.

- All State CSBG Lead Agencies are strongly encouraged to review the developed COE-developed organizational standards and proceed immediately with plans to coordinate with partners in the State on the establishment and implementation of organizational standards.
- If a State establishes a different set of organizational standards, the standards must encompass requirements of the CSBG Act and other Federal requirements, such as those found in the relevant OMB Circulars, and will be subject to OCS review during the application review process. States must ensure that these alternative organizational standards are at least as rigorous and comprehensive as the COE-developed organizational standards.
- OCS will implement new procedures for State reporting on organizational standards in upcoming State CSBG Plans and CSBG Annual Reports.

## **Background**

Budget constraints, high poverty levels, changing demographics, and income inequality demand that we remain diligent in our shared mission of creating opportunity for all Americans. We must look at all levels of the CSBG Network—local, State and Federal—to assess and increase the magnitude of CSBG’s impact. CSBG is a far-reaching, nationwide network, and has the potential to achieve even greater results, in every community, by improving our accountability to one another, our customers, and communities.

As we commemorate the 50th anniversary of the War on Poverty and face new challenges and opportunities, we must ask ourselves:

- How do we make sure we have high-performing organizations with the capacity to provide quality services to Americans struggling to move into the middle class?
- How do we make sure organizations at the Federal, State and local levels have systems of accountability to demonstrate results?
- How do we pursue greater levels of impact for the individuals, families, and communities we serve?

In an effort to help the CSBG Network answer these questions, OCS launched two streams of work in 2012. The first stream focuses on establishing organizational standards for eligible entities. Under this effort, CSBG Network leaders created and recommended to OCS a set of organizational standards, described in this IM, to strengthen the capacity of the more than 1,000 eligible entities providing services across the country. These COE-developed organizational standards have the potential to protect and enhance the structural integrity of this national network by assuring that all entities that annually receive CSBG funds have the capacity to organize and support a comprehensive community response to the devastating impacts of poverty.

The second stream of work focuses on enhancing the CSBG Network's performance management system for local eligible entities – identified in the CSBG Act as Results Oriented Management and Accountability (ROMA). Later this year, OCS will release information on the results of the collective effort to examine and update ROMA. State- and Federal-level accountability measures will complement efforts at the local level involving 'ROMA Next Generation' and the COE-developed organizational standards.

#### **Efforts to Establish Organizational Standards for CSBG Eligible Entities**

To aid in the establishment of organizational standards for CSBG eligible entities, in 2012, OCS funded a cooperative agreement for the COE. The two-year cooperative agreement coordinated – with input from local, State, and national partners – the development and dissemination of a set of organizational standards for eligible entities with the central mission of ensuring that all CSBG eligible entities have the capacity to provide high-quality services to low-income individuals and communities.

With the support of the OCS funding, an existing CSBG Working Group grew from its original 20 members to over 50 individuals, and included a balanced representation from eligible entities, State CSBG Lead Agencies, Community Action State Associations, national partners, technical assistance providers, and external content experts. The Working Group's efforts began with a thorough environmental scan of existing tools and resources, internal and external to the CSBG Network, which informed the development of the standards. The Working Group found that while there are many similarities across States in how State CSBG Lead Agencies monitor eligible entities, substantial differences still exist. Given that one intended outcome of this project is to standardize accountability tools nationwide, while also preserving the States' flexibility inherent and desirable in a block grant, this analysis was a critical first step.

The project continued through a nine-month development process that provided numerous points for input by the CSBG Network on draft organizational standards language. The final phase included a pilot that engaged a subset of State CSBG Lead Agencies and eligible entities in a field test of draft language and tools.

The result of these efforts is a comprehensive set of organizational standards organized in three thematic groups, comprised of nine categories and 56 standards. The thematic groups and nine categories of standards are outlined below:

- **Maximum Feasible Participation**
  - Consumer Input and Involvement
  - Community Engagement
  - Community Assessment
  
- **Vision and Direction**
  - Organizational Leadership
  - Board Governance
  - Strategic Planning
  
- **Operations and Accountability**
  - Human Resource Management
  - Financial Operations and Oversight
  - Data and Analysis

The COE tailored the standards for use by both private and public eligible entities, attached as Appendix 2 and Appendix 3 to this IM. In addition, more detailed tools and materials to assist in the implementation of the standards are available on the [Community Action Partnership](#) website.

### **State Authority and Responsibility to Establish Organizational Standards**

Assuring high standards for the use of CSBG funds is a shared responsibility among OCS, State CSBG Lead Agencies, and eligible entities at the community level. Under Section 678B of the CSBG Act, 42 U.S.C. § 9914, State CSBG Lead Agencies have the authority to establish and monitor goals, standards, and requirements that assure an appropriate level of accountability and quality among the State's eligible entities. While the collection of grantees supported by CSBG has a long and important history of work on behalf of low-income people, the CSBG Network should regularly assess organizational capacity through a consistent set of standards so as to meet the changing and current needs of low-income people. State monitoring, according to these set of goals, standards, and requirements, is essential to the continued success of CSBG.

In order to meet CSBG Act State responsibilities, all State CSBG Lead Agencies must establish and communicate standards and requirements to eligible entities. Critical areas for organizational standards are based on the requirements of the CSBG Act and the values of Community Action, and include: consumer input and involvement; community engagement; community assessment; organizational leadership; board governance; strategic planning; human resource management; financial operations and oversight; and data and analysis.

The COE has developed a well-vetted set of organizational standards and tools that are directly applicable to CSBG. These standards are consistent with the CSBG Act and applicable Federal statute and regulations. In addition, collective use of these standards will ensure consistency among State agencies throughout the Network. Furthermore, the COE has developed a number of tools and training materials that will assist States in implementation.

Although a State may establish and communicate a different set of organizational standards for its eligible entities, the State must ensure that alternative organizational standards are at least as

rigorous and comprehensive as the organizational standards developed by the COE. If a State establishes a different set of organizational standards, the alternative standards must encompass requirements of the CSBG Act and other Federal requirements, such as those found in the relevant OMB Circulars, as well as the critical areas noted above. Alternative standards will be subject to OCS review during the application review process.

### **OCS Expectations of State Efforts to Establish and Implement Organizational Standards**

The establishment of new organizational standards should include a fair and reasonable process. Whether States elect to use the COE-developed organizational standards or a different set, they should allow for input from the boards and leadership of eligible entities on the timing and procedures for implementing, documenting, and reporting on the standards.

Standards must be implemented in a manner consistent with State rules. Organizational standards should be clearly communicated prior to State monitoring activities, and consistently reiterated in State CSBG plans, contracts with eligible entities, funding documents, monitoring instruments, and monitoring reports. In addition, States have authority to supplement the COE-developed organizational standards, provided that additions or changes are implemented in a manner consistent with the CSBG Act and other applicable Federal and State requirements. A chart describing key considerations for implementation is included as Appendix I.

The organizational standards established by States must provide a consistent foundation for participation in the CSBG Network. They must be designed to assure that all eligible entities meet a high standard of quality, not only in the critical financial and administrative areas important to all nonprofit and public human service agencies, but also in areas that are of unique importance for CSBG and its role in supporting eligible entities. Once established, a State's organizational standards should only be modified based on established State rules and procedures that are publicly communicated and transparent.

### **Organizational Standards, State Monitoring, Corrective Action, Reduction of Funding and Termination**

Monitoring requirements outlined in the CSBG Act give State CSBG Lead Agencies a central role in monitoring whether eligible entities meet established goals, standards, and requirements. States have the responsibility to provide technical assistance and corrective action when it determines an eligible entity does not meet goals, standards, or requirements.

In some instances, States may determine, as the result of monitoring, that an eligible entity has deficiencies. When an eligible entity fails to meet State standards and requirements, State CSBG Lead Agencies must assess whether technical assistance is warranted, provide the needed training and technical assistance, if appropriate, and require corrective action based on a Quality Improvement Plan.

While some deficiencies may be remedied through immediate corrective action, failure to meet multiple requirements or standards may reflect widespread or systemic issues that cannot be feasibly corrected within a reasonable timeframe. In such cases, States must assess whether

additional actions are necessary, including reduction or termination of funding.

Under Sections 678C(a) of the CSBG Act, 42 U.S.C. § 9915(a), States may reduce funding or terminate eligibility for CSBG funding when an eligible entity fails to: 1) comply with the terms of an agreement or a State plan; 2) provide services; or 3) meet appropriate standards, goals, and other requirements established by the State, including performance objectives.

Clear instances of organizational fraud, systemic abuse of funds, or criminal activity may be considered as cause for an immediate hearing on termination without the opportunity for training, technical assistance, or corrective action. On the other end of the spectrum, a narrow failure to meet a single requirement or standard may more appropriately result in technical assistance or renegotiation of future performance goals. At either end of the spectrum, a State's expectations and procedures must be clearly communicated and are subject to Federal review in the event of a termination or reduction in funding.

Key requirements related to reduction of funding or termination of eligible entity status are discussed in [CSBG IM 116](#) (*Corrective Action, Termination, or Reduction of Funding*), issued May 1, 2012.

As outlined in IM 116, State CSBG agencies must comply with statutory and regulatory requirements for terminating organizational eligibility or otherwise reducing the share of funding allocated to any CSBG eligible entity. When a deficiency has been identified and it has not or cannot be resolved, the State must provide adequate notice and an opportunity for a hearing prior to taking adverse funding action or terminating eligible entity status. If a State reduces or terminates funding, a Federal review of the State decision may be initiated through a request from the affected organization.

State organizational standards must include clear procedures for determining whether an agency has the ongoing capacity to plan for and deliver high-quality CSBG services as a member of the CSBG Network. When a State determines that an eligible entity has failed to meet organizational standards and correct identified deficiencies, the State should pursue a reduction or termination of funding. When funding is terminated to an eligible entity, States must follow CSBG Act requirements as well as State rules and regulations about designating a new eligible entity and awarding CSBG funds to a new entity.

### **Use of Organizational Standards by Eligible Entity Boards**

One of the most critical stakeholders in assuring adherence to established organizational standards is the eligible entity board that oversees operations on behalf of the local community. Organizational standards not only serve as a new tool for States to help meet their oversight responsibilities, but they can also assist eligible entity boards in assuring accountability to the local community. The primary responsibility of the board is to assure that the eligible entity not only meets all Federal and State requirements, but also provides high quality services to low income people and the community served. Board members serve to protect the interests of the low-income community by making sure the eligible entity has the capacity to be successful.

Eligible entity boards must look beyond basic compliance to assure that the organization meets high standards of quality, accountability, and effectiveness. Therefore, the organizational standards established by States should provide one basis for board review of the organization but the board must also use other accountability and oversight tools. The board must also focus on an eligible entity's overall responsiveness to changing community needs and provision of a comprehensive set of high-quality services designed to reduce poverty and strengthen communities.

### **State Reporting on Organizational Standards**

In upcoming submissions of State CSBG plans, we anticipate that all State CSBG Lead Agencies will be required to provide a description of State organizational standards for eligible entities that receive CSBG funds. If States are implementing new organizational standards based on products and materials developed by the OCS-funded Organizational Standards COE, they will be asked to describe a timeline for implementation, and describe the process for input and reporting from the eligible entities and other stakeholders.

If a State is not implementing the organizational standards recommended by the COE, it will be required 1) to explain the reasons for using alternative standards, 2) to describe the alternative State standards, implementation timeline, and reporting procedures in detail, and 3) ensure that the alternative standards are at least as rigorous and comprehensive as the COE-developed standards.

OCS will ask all States to explain and address the absence of any standards related to the following critical areas: consumer input and involvement; community engagement; community assessment; organizational leadership; board governance; strategic planning; human resource management; financial operations and oversight; and data and analysis.

### **Conclusion**

OCS places a high priority on the assurance that all eligible entities that receive CSBG funds are accountable to a set of organizational standards. No later than Fiscal Year 2016, all States will be expected to report on the establishment and implementation of organizational standards. Procedures to meet such standards are a shared responsibility between the local eligible entities, the State CSBG Lead Agencies, and OCS. OCS will implement new procedures for State reporting on organizational standards in upcoming State CSBG Plans and CSBG Annual Reports. Therefore, all State CSBG Lead Agencies are strongly encouraged to review the organizational standards developed by the CSBG Organizational Standards COE, and should proceed immediately with plans to coordinate with partners in the State on the establishment and implementation of organizational standards.

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Jeannie L. Chaffin  
Director  
Office of Community Services

## Appendix 1: State Implementation of Organizational Standards – Key Considerations

Critical Action Area	Description	Critical Partners and Available Resources
<b>Initial discussions with key partners in the State</b>	<i>State convenes discussions with eligible entities, State CAA Association, and other partners to discuss process and timeline for adopting COE-developed organizational standards.</i>	State CSBG Lead Agency, eligible entities, State CAA Association
<b>Assessment of State laws and rulemaking requirements</b>	<i>State CSBG officials, legal counsel, and contracting officials review existing State laws, regulations, and contracting procedures for necessary actions or venues for communication of standards (e.g. State register).</i>	State procurement office, State agency counsel, National Association for State Community Services Programs (NASCSPP), Community Action Program Legal Services, Inc.
<b>Development and public notification of State standards</b>	<i>After review of current rules, standards and requirements, State CSBG officials identify and communicate anticipated organizational standards for CSBG eligible entities. Standards are communicated in writing through State register notice, website publication, or other public notice consistent with State procedures and rulemaking requirements.</i>	CSBG Organizational Standards Center of Excellence
<b>Opportunities for input on timelines and procedures</b>	<i>Through public meetings, consultations, hearings, and written input processes, States provide opportunities for input from CSBG eligible entities and other stakeholders on the timelines and procedures for implementation of organizational standards, including processes for incorporating into State monitoring procedures and organizational bylaws, as appropriate.</i>	CSBG Regional Performance and Innovation Consortia (RPIC), State CAA Association
<b>Development and communication of technical assistance strategies</b>	<i>In partnership with State and national technical assistance partners, the State establishes and communicates a technical assistance strategy to help assure that all CSBG eligible entities have access to technical assistance to meet required standards. Assistance in agency self-assessment may be provided. Technical assistance may be funded through State discretionary resources, may be sponsored Federally, or may be paid for by affected organizations, as appropriate.</i>	CSBG Organizational Standards Center of Excellence, CSBG Learning Communities Resource Center, CSBG Risk Mitigation Training and Technical Assistance Center, CSBG RPIC, State CSBG Associations, Office of Community Services (OCS) State Liaison staff

Critical Action Area	Description	Critical Partners and Available Resources
<p><b>Incorporation of standards in State CSBG Plan</b></p>	<p><i>State CSBG officials incorporate organizational standards and procedures for implementation into annual State CSBG Plans. These plans are made available for public inspection consistent with requirements in the CSBG Act and are submitted for Federal review as part of the application for CSBG funds.</i></p>	<p>NASCSP, CSBG Organizational Standards Center of Excellence, OCS State Liaison staff</p>
<p><b>Incorporation of standards in local CSBG Plans and agency bylaws and procedures</b></p>	<p><i>Eligible entity boards and leadership incorporate organizational standards into organizational bylaws and modify organizational procedures and practices, as appropriate, to assure compliance with all standards and procedures. Compliance with organizational standards is incorporated into board oversight and executive performance plans as appropriate.</i></p>	<p>CSBG Organizational Standards Center of Excellence, Community Action Program Legal Services, Inc., State CAA Association</p>
<p><b>Assessment and communication of results</b></p>	<p><i>State organizational standards are incorporated into all State monitoring practices. As required under the CSBG Act, a full onsite review is conducted at least once every three years and ad hoc monitoring is conducted as necessary.</i></p>	<p>NASCSP, CSBG Organizational Standards Center of Excellence, OCS State Liaison staff</p>
<p><b>Corrective action cycle</b></p>	<p><i>When State identifies non-compliance through State monitoring, it clearly communicates specific deficiencies and requirements for corrective action and offers technical assistance as appropriate. As necessary, States may initiate further procedures or funding actions consistent with the CSBG Act. In situations in which an eligible entity does not correct significant deficiencies within required deadlines, or in which widespread or systemic issues are identified that cannot feasibly be corrected in a reasonable timeframe, a State may initiate action to terminate eligible entity status consistent with the CSBG Act. Conversely, agencies that are identified as having best practices related to State standards may be identified as exemplars and assist in quality improvement efforts as appropriate.</i></p>	<p>CSBG Learning Communities Resource Center, CSBG Risk Mitigation Training and Technical Assistance Center, State CSBG Associations, OCS State Liaison staff</p> <p>Note: For detailed guidance on CSBG requirements, see <a href="#">IM 116</a>.</p>

**Appendix 2: Organizational Standards COE Proposed Private Agency Standards**

## **PROPOSED ORGANIZATIONAL STANDARDS FOR PRIVATE COMMUNITY ACTION AGENCIES**

### **MAXIMUM FEASIBLE PARTICIPATION**

#### **Category one: Consumer Input and Involvement**

Community Action is rooted in the belief that people with low incomes are in the best position to express what they need to make a difference in their lives. CSBG eligible Entities work in partnership with the people and communities they serve. Community Action works in a coordinated and comprehensive manner to develop programs and services that will make a critical difference in lives of participants. Individuals and families are well attuned to what they need, and when Community Action taps into that knowledge, it informs our ability to implement high-impact programs and services.

Research shows that through engagement in community activities such as board governance, peer to peer leadership, advisory bodies, volunteering, and other participatory means, the poor build personal networks and increase their social capital so that they are able to move themselves and their families out of poverty. Community Action is grounded in helping families and communities build this social capital for movement to self-sufficiency.

- |                               |  |
|-------------------------------|--|
| <b>Standard 1.1 • private</b> | The Organization demonstrates low-income individuals' participation in its activities.   |
| <b>Standard 1.2 • private</b> | The Organization analyzes information collected directly from low-income individuals as part of the Community Assessment.              |
| <b>Standard 1.3 • private</b> | The Organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board. |

**Category two: Community Engagement**

No CSBG Eligible Entity can meet all of a community's needs independently. Through formal and informal partnerships, ongoing community planning, advocacy, and engagement of people with low incomes, partners ranging from community and faith-based organizations, educational institutions, government, and business can work together with Community Action Agencies to successfully move families out of poverty and revitalize communities.

Community Action is often the backbone organization of community efforts to address poverty and community revitalization: leveraging funds, convening key partners, adding the voice of the underrepresented, and being the central coordinator of efforts. It is not an easy role to play, but a vital one for families and communities.

**Standard 2.1 • private**

The Organization has documented or demonstrated partnerships across the community, specifically including other anti-poverty organizations in the area.

**Standard 2.2 • private**

The Organization utilizes information gathered from key sectors of the community in assessing needs and resources. This would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.

**Standard 2.3 • private**

The Organization communicates its activities and its results to the community.

**Standard 2.4 • private**

The Organization documents the number of volunteers and hours mobilized in support of its activities.

**Category three: Community Assessment**

Local control of Federal CSBG resources is predicated on regular comprehensive Community Assessments that take into account the breadth of community needs as well as the partners and resources available in a community to meet these needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

- Standard 3.1 • private**      The Organization conducted a Community Assessment and issued a report within the past 3 years.
- Standard 3.2 • private**      As part of the Community Assessment, the Organization collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).
- Standard 3.3 • private**      The Organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the Community Assessment.
- Standard 3.4 • private**      The governing board formally accepts the completed Community Assessment.

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## VISION AND DIRECTION

### Category four: Organizational Leadership

Community Action leadership is exemplified at all levels across the organization and starts with a mission that clarifies Community Action's work on poverty. A well-functioning board, a focused Chief Executive, well-trained and dedicated staff, and volunteers giving of themselves to help others will establish Community Action as the cornerstone and leverage point to address poverty across the community. Ensuring strong leadership both for today and into the future is critical.

This category addresses the foundational elements of mission as well as the implementation of the Network's model of good performance management (ROMA). It ensures CAAs have taken steps to plan thoughtfully for today's work and tomorrow's leadership.

- Standard 4.1 • private**      The governing board has reviewed the Organization's mission statement within the past 5 years and assured that:
1. The mission addresses poverty; and
  2. The Organization's programs and services are in alignment with the mission.
- Standard 4.2 • private**      The Organization's Community Action Plan is outcome-based, anti-poverty focused, and ties directly to the Community Assessment.
- Standard 4.3 • private**      The Organization's Community Action Plan and Strategic Plan document the continuous use of the full ROMA cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the Organization documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.
- Standard 4.4 • private**      The Organization has a written succession plan in place for the CEO/ED, approved by the governing board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.
- Standard 4.5 • private**      An organization-wide risk assessment has been completed within the past 2 years and reported to the governing board.

### **Category five: Board Governance**

Community Action Boards are uniquely structured to ensure maximum feasible participation by the entire community, including those the Network serves. By law, Community Action Boards are comprised of 1/3 low-income consumers (or their representatives), 1/3 elected officials (or their appointees), and 1/3 the private-sector community members. To make this structure work as intended, CAAs must recruit board members thoughtfully, work within communities to promote opportunities for board service, and orient, train, and support them in their oversight role. Boards are foundational to good organizational performance and the time invested to keep them healthy and active is significant, but necessary.

- Standard 5.1 • private** The Organization's governing board is structured in compliance with the CSBG Act:
1. At least one third democratically-selected representatives of the low-income community;
  2. One-third local elected officials (or their representatives); and
  3. The remaining membership from major groups and interests in the community.
- Standard 5.2 • private** The Organization's governing board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.
- Standard 5.3 • private** The Organization's bylaws have been reviewed by an attorney within the past 5 years.
- Standard 5.4 • private** The Organization documents that each governing board member has received a copy of the bylaws within the past 2 years.
- Standard 5.5 • private** The Organization's governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.
- Standard 5.6 • private** Each governing board member has signed a conflict of interest policy within the past 2 years.
- Standard 5.7 • private** The Organization has a process to provide a structured orientation for governing board members within 6 months of being seated.
- Standard 5.8 • private** Governing board members have been provided with training on their duties and responsibilities within the past 2 years.
- Standard 5.9 • private** The Organization's governing board receives programmatic reports at each regular board meeting.

**Category six: Strategic Planning**

Establishing the vision for a Community Action Agency is a big task and setting the course to reach it through strategic planning is serious business. CSBG eligible Entities take on this task by looking both at internal functioning and at the community's needs. An efficient organization knows where it is headed, how the board and staff fit into that future, and how it will measure its success in achieving what it has set out to do. This agency-wide process is board-led and ongoing. A "living, breathing" Strategic Plan with measurable outcomes is the goal, rather than a plan that gets written but sits on a shelf and stagnates. Often set with an ambitious vision, Strategic Plans set the tone for the staff and board and are a key leadership and management tool for the organization.

- Standard 6.1 • private**      The Organization has an agency-wide Strategic Plan in place that has been approved by the governing board within the past 5 years.
- Standard 6.2 • private**      The approved Strategic Plan addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.
- Standard 6.3 • private**      The approved Strategic Plan contains Family, Agency, and/or Community goals.
- Standard 6.4 • private**      Customer satisfaction data and customer input, collected as part of the Community Assessment, is included in the strategic planning process.
- Standard 6.5 • private**      The governing board has received an update(s) on meeting the goals of the Strategic Plan within the past 12 months.

## **OPERATIONS AND ACCOUNTABILITY**

### **Category seven: Human Resource Management**

The human element of Community Action's work is evident at all levels of the organization and the relationship an organization has with its staff often reflects the organization's values and mission. Oversight of the Chief Executive and maintaining a strong human resources infrastructure are key responsibilities of board oversight. Attention to organizational elements such as policies and procedures, performance appraisals, and training lead to strong organizations with the capacity to deliver high-quality services in low-income communities.

- Standard 7.1 • private**      The Organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.
- Standard 7.2 • private**      The Organization makes available the Employee Handbook (or personnel policies in cases without a Handbook) to all staff and notifies staff of any changes.
- Standard 7.3 • private**      The Organization has written job descriptions for all positions, which have been updated within the past 5 years.
- Standard 7.4 • private**      The governing board conducts a performance appraisal of the CEO/Executive Director within each calendar year.
- Standard 7.5 • private**      The governing board reviews and approves CEO/Executive Director compensation within every calendar year.
- Standard 7.6 • private**      The Organization has a policy in place for regular written evaluation of employees by their supervisors.
- Standard 7.7 • private**      The Organization has a whistleblower policy that has been approved by the governing board.
- Standard 7.8 • private**      All staff participate in a new employee orientation within 60 days of hire.
- Standard 7.9 • private**      The Organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.

**Category eight: Financial Operations and Oversight**

The fiscal bottom line of Community Action is not isolated from the mission, it is a joint consideration. Community Action Boards and staff maintain a high level of fiscal accountability through audits, monitoring by State and Federal agencies, and compliance with Federal Office of Management Budget circulars. The management of Federal funds is taken seriously by CSBG eligible Entities and the Standards specifically reflect the board's oversight role as well as the day-to-day operational functions.

- Standard 8.1 • private** The Organization's annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with OMB Circular A-133 (if applicable) and/or State audit threshold requirements.
- Standard 8.2 • private** All findings from the prior year's annual audit have been assessed by the Organization and addressed where the governing board has deemed it appropriate.
- Standard 8.3 • private** The Organization's auditor presents the audit to the governing board.
- Standard 8.4 • private** The governing board formally receives and accepts the audit.
- Standard 8.5 • private** The Organization has solicited bids for its audit within the past 5 years.
- Standard 8.6 • private** The IRS Form 990 is completed annually and made available to the governing board for review.
- Standard 8.7 • private** The governing board receives financial reports at each regular meeting that include the following:
1. Organization-wide report on Revenue and Expenditures that compares Budget to Actual, categorized by program; and
  2. Balance Sheet/Statement of Financial Position.
- Standard 8.8 • private** All required filings and payments related to payroll withholdings are completed on time.
- Standard 8.9 • private** The governing board annually approves an organization-wide budget.
- Standard 8.10 • private** The Fiscal Policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.
- Standard 8.11 • private** A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.
- Standard 8.12 • private** The Organization documents how it allocates shared costs through an indirect cost rate, or through a written cost allocation plan.
- Standard 8.13 • private** The Organization has a written policy in place for record retention and destruction.

**Category nine: Data and Analysis**

The Community Action Network moves families out of poverty every day across this country and needs to produce data that reflect the collective impact of these efforts. Individual stories are compelling when combined with quantitative data: *no data without stories and no stories without data*. Community Action needs to better document the outcomes families, agencies, and communities achieve. The Community Services Block Grant funding confers the obligation and opportunity to tell the story of agency-wide impact and community change, and in turn the impact of the Network as a whole.

- |                               |   |
|-------------------------------|---|
| <b>Standard 9.1 • private</b> | The Organization has a system or systems in place to track and report services customers receive.                   |
| <b>Standard 9.2 • private</b> | The Organization has a system or systems in place to track Family, Agency, and/or Community outcomes.               |
| <b>Standard 9.3 • private</b> | The Organization has analyzed its outcomes within the past 12 months.   |
| <b>Standard 9.4 • private</b> | The Organization submits its annual CSBG Information Survey Data Report and it reflects organization-wide outcomes. |

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**Appendix 3: Organizational Standards COE Proposed Public Agency Standards**

# **PROPOSED ORGANIZATIONAL STANDARDS FOR PUBLIC COMMUNITY ACTION AGENCIES**

## **MAXIMUM FEASIBLE PARTICIPATION**

### **Category one: Consumer Input and Involvement**

Community Action is rooted in the belief that people with low incomes are in the best position to express what they need to make a difference in their lives. CSBG Eligible Entities work in partnership with the people and communities they serve. Community Action works in a coordinated and comprehensive manner to develop programs and services that will make a critical difference in lives of participants. Individuals and families are well attuned to what they need, and when Community Action taps into that knowledge, it informs our ability to implement high impact programs and services.

Research shows that through engagement in community activities such as board governance, peer to peer leadership, advisory bodies, volunteering, and other participatory means, the poor build personal networks and increase their social capital so that they are able to move themselves and their families out of poverty. Community Action is grounded in helping families and communities build this social capital for movement to self-sufficiency.

- |                              |  |
|------------------------------|--|
| <b>Standard 1.1 • public</b> | The Department demonstrates low-income individuals' participation in its activities.   |
| <b>Standard 1.2 • public</b> | The Department analyzes information collected directly from low-income individuals as part of the Community Assessment.  |
| <b>Standard 1.3 • public</b> | The Department has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the tripartite board/advisory body, which may be met through broader local government processes. |

**Category two: Community Engagement**

No CSBG Eligible Entity can meet all of a community's needs independently. Through formal and informal partnerships, ongoing community planning, advocacy, and engagement of people with low incomes, partners ranging from community and faith-based organizations, educational institutions, government, and business can work together with Community Action Agencies to successfully move families out of poverty and revitalize communities.

Community Action is often the backbone organization of community efforts to address poverty and community revitalization: leveraging funds, convening key partners, adding the voice of the underrepresented, and being the central coordinator of efforts. It is not an easy role to play, but a vital one for families and communities.

**Standard 2.1 • public**      The Department has documented or demonstrated partnerships across the community, specifically including other anti-poverty organizations in the area.

**Standard 2.2 • public**      The Department utilizes information gathered from key sectors of the community in assessing needs and resources. This would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.

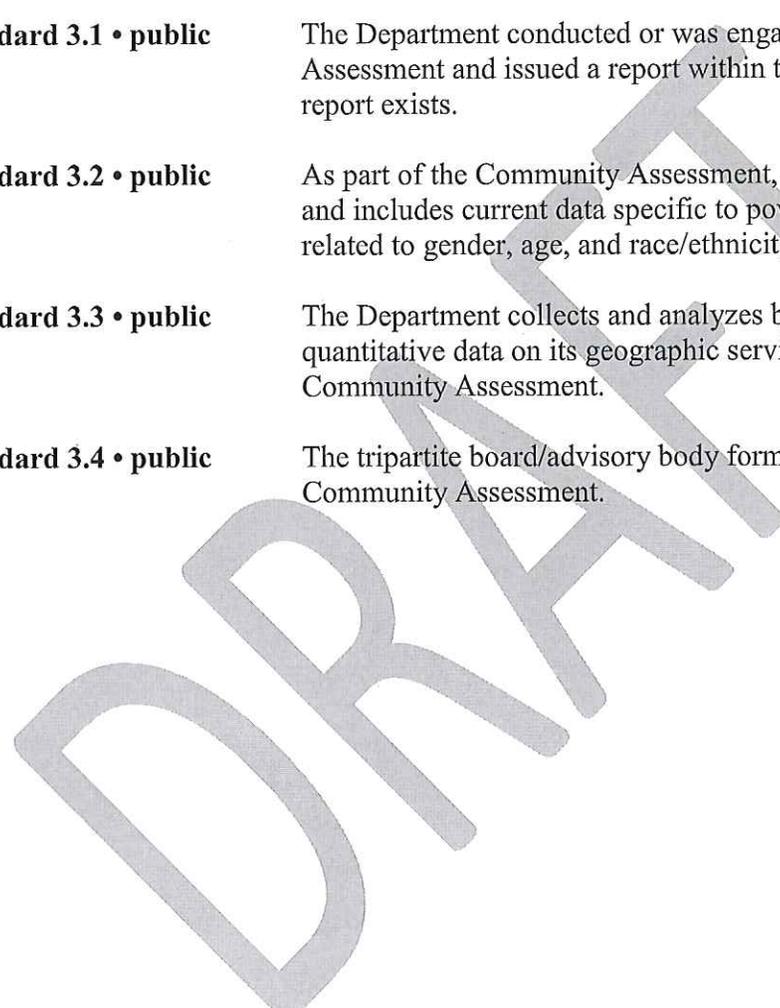
**Standard 2.3 • public**      The Department communicates its activities and its results to the community.

**Standard 2.4 • public**      The Department documents the number of volunteers and hours mobilized in support of its activities.

**Category three: Community Assessment**

Local control of Federal CSBG resources is predicated on regular comprehensive Community Assessments that take into account the breadth of community needs as well as the partners and resources available in a community to meet these needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

- Standard 3.1 • public**      The Department conducted or was engaged in a Community Assessment and issued a report within the past 3 years, if no other report exists.
- Standard 3.2 • public**      As part of the Community Assessment, the Department collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).
- Standard 3.3 • public**      The Department collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the Community Assessment.
- Standard 3.4 • public**      The tripartite board/advisory body formally accepts the completed Community Assessment.



## VISION AND DIRECTION

### Category four: Organizational Leadership

Community Action leadership is exemplified at all levels across the organization and starts with a mission that clarifies Community Action's work on poverty. A well-functioning board, a focused Chief Executive, well-trained and dedicated staff, and volunteers giving of themselves to help others will establish Community Action as the cornerstone and leverage point to address poverty across the community. Ensuring strong leadership both for today and into the future is critical.

This category addresses the foundational elements of mission as well as the implementation of the Network's model of good performance management (ROMA). It ensures CAAs have taken steps to plan thoughtfully for today's work and tomorrow's leadership.

- Standard 4.1 • public** The tripartite board/advisory body has reviewed the Department's mission statement within the past 5 years and assured that:
1. The mission addresses poverty; and
  2. The CSBG programs and services are in alignment with the mission.
- Standard 4.2 • public** The Department's Community Action Plan is outcome-based, anti-poverty focused, and ties directly to the Community Assessment.
- Standard 4.3 • public** The Department's Community Action Plan and Strategic Plan document the continuous use of the full ROMA cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the Department documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.
- Standard 4.4 • public** The Department adheres to its local government's policies and procedures around interim appointments and processes for filling a permanent vacancy.
- Standard 4.5 • public** The Department complies with its local government's risk assessment policies and procedures.

**Category five: Board Governance**

Community Action Boards are uniquely structured to ensure maximum feasible participation by the entire community, including those the Network serves. By law, Community Action Boards are comprised of 1/3 low-income consumers (or their representatives), 1/3 elected officials (or their appointees), and 1/3 private-sector community members. To make this structure work as intended, CAAs must recruit board members thoughtfully, work within communities to promote opportunities for board service, and orient, train, and support them in their oversight role. Boards are foundational to good organizational performance and the time invested to keep them healthy and active is significant, but necessary.

**Standard 5.1 • public**

The Department's tripartite board/advisory body is structured in compliance with the CSBG Act, by either:

1. At least one third democratically-selected representatives of the low-income community;
2. With one-third local elected officials (or their representatives); and
3. The remaining membership from major groups and interests in the community.

*OR another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs.*

**Standard 5.2 • public**

The Department's tripartite board/advisory body either has:

1. Written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.
2. OR another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs.

*Please note under IM 82 for Public Entities the law also requires that a minimum of 1/3 of tripartite board membership be comprised of representatives of low-income individuals and families who reside in areas served.*

**Standard 5.3 • public**

The Department documents that each tripartite board/advisory body member has received a copy of the governing documents, within the past 2 years.

**Standard 5.4 • public**

The Department documents that each tripartite board/advisory body member has received a copy of the governing documents, within the past 2 years.

- Standard 5.5 • public** The Department's tripartite board/advisory body meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its governing documents.
- Standard 5.6 • public** Each tripartite board/advisory body member has signed a conflict of interest policy, or comparable local government document, within the past 2 years.
- Standard 5.7 • public** The Department has a process to provide a structured orientation for tripartite board/advisory body members within 6 months of being seated.
- Standard 5.8 • public** Tripartite board/advisory body members have been provided with training on their duties and responsibilities within the past 2 years.
- Standard 5.9 • public** The Department's tripartite board/advisory body receives programmatic reports at each regular board/advisory meeting.

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### **Category six: Strategic Planning**

Establishing the vision for a Community Action Agency is a big task and setting the course to reach it through strategic planning is serious business. CSBG Eligible Entities take on this task by looking both at internal functioning and at the community's needs. An efficient organization knows where it is headed, how the board and staff fit into that future, and how it will measure its success in achieving what it has set out to do. This agency-wide process is board-led and ongoing. A "living, breathing" Strategic Plan with measurable outcomes is the goal, rather than a plan that gets written but sits on a shelf and stagnates. Often set with an ambitious vision, Strategic Plans set the tone for the staff and board and are a key leadership and management tool for the organization.

#### **Standard 6.1 • public**

The Department has a Strategic Plan, or comparable planning document, in place that has been reviewed and accepted by the tripartite board/advisory body within the past 5 years. If the Department does not have a plan, the tripartite board/advisory body will develop the plan.

#### **Standard 6.2 • public**

The approved Strategic Plan, or comparable planning document, addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.

#### **Standard 6.3 • public**

The approved Strategic Plan, or comparable planning document, contains Family, Agency, and/or Community goals.

#### **Standard 6.4 • public**

Customer satisfaction data and customer input, collected as part of the Community Assessment, is included in the strategic planning process, or comparable planning process.

#### **Standard 6.5 • public**

The tripartite board/advisory body has received an update(s) on meeting the goals of the Strategic Plan/comparable planning document within the past 12 months.

## OPERATIONS AND ACCOUNTABILITY

### Category seven: Human Resource Management

The human element of Community Action's work is evident at all levels of the organization and the relationship an organization has with its staff often reflects the organization's values and mission. Oversight of the Chief Executive and maintaining a strong human resources infrastructure are key responsibilities of board oversight. Attention to organizational elements such as policies and procedures, performance appraisals, and training lead to strong organizations with the capacity to deliver high-quality services in low-income communities.

- Standard 7.1 • public** Local governmental personnel policies are outside of the purview of the Department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
- Standard 7.2 • public** The Department follows local governmental policies in making available the Employee Handbook (or personnel policies in cases without a Handbook) to all staff and in notifying staff of any changes.
- Standard 7.3 • public** The Department has written job descriptions for all positions. Updates may be outside of the purview of the Department.
- Standard 7.4 • public** The Department follows local government procedures for performance appraisal of the Department Head.
- Standard 7.5 • public** The compensation of the Department Head is made available according to local government procedure.
- Standard 7.6 • public** The Department follows local governmental policies for regular written evaluation of employees by their supervisors.
- Standard 7.7 • public** The Department provides a copy of any existing local government whistleblower policy to members of the tripartite board/advisory body at the time of orientation.
- Standard 7.8 • public** The Department follows local governmental policies for new employee orientation.
- Standard 7.9 • public** The Department conducts or makes available staff development/training (including ROMA training) on an ongoing basis.

**Category eight: Financial Operations and Oversight**

The fiscal bottom line of Community Action is not isolated from the mission, it is a joint consideration. Community Action boards and staff maintain a high level of fiscal accountability through audits, monitoring by State and Federal agencies, and compliance with Federal Office of Management Budget circulars. The management of Federal funds is taken seriously by CSBG Eligible Entities and the Standards specifically reflect the board's oversight role as well as the day-to-day operational functions.

- Standard 8.1 • public**      The Department's annual audit is completed through the local governmental process in accordance with OMB A-133 (if applicable) and/or State audit threshold requirements. This may be included in the municipal entity's full audit.
- Standard 8.2 • public**      The Department follows local government procedures in addressing any audit findings related to CSBG funding.
- Standard 8.3 • public**      The Department's tripartite board/advisory body is notified of the availability of the local government audit.
- Standard 8.4 • public**      The Department's tripartite board/advisory body is notified of any findings related to CSBG funding.
- Standard 8.5 • public**      The audit bid process is outside of the purview of tripartite board/advisory body therefore this standard does not apply to public entities.
- Standard 8.6 • public**      The Federal tax reporting process for local governments is outside of the purview of tripartite board/advisory body therefore this standard does not apply to public entities.
- Standard 8.7 • public**      The tripartite board/advisory body receives financial reports at each regular meeting, for those program(s) the body advises, as allowed by local government procedure.
- Standard 8.8 • public**      The payroll withholding process for local governments is outside of the purview of the Department, therefore this standard does not apply to public entities.
- Standard 8.9 • public**      The tripartite board/advisory body has input as allowed by local governmental procedure into the CSBG budget process.
- Standard 8.10 • public**      The Fiscal Policies for local governments are outside of the purview of the Department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

**Standard 8.11 • public**

Local governmental procurement policies are outside of the purview of the Department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

**Standard 8.12 • public**

A written cost allocation plan is outside of the purview of the Department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

**Standard 8.13 • public**

The Department follows local governmental policies for document retention and destruction.

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**Category nine: Data and Analysis**

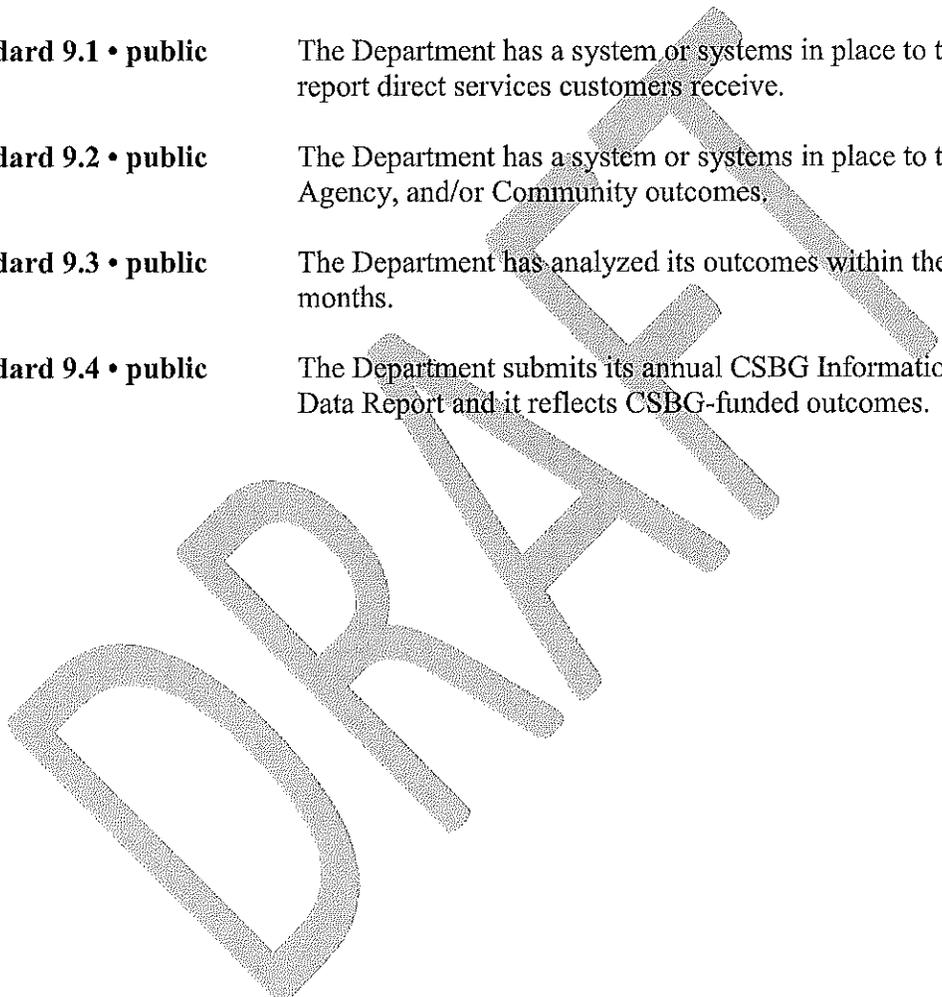
The Community Action Network moves families out of poverty every day across this country and needs to produce data that reflect the collective impact of these efforts. Individual stories are compelling when combined with quantitative data: *no data without stories and no stories without data*. Community Action needs to better document the outcomes families, agencies, and communities achieve. The Community Services Block Grant funding confers the obligation and opportunity to tell the story of agency-wide impact and community change, and in turn the impact of the Network as a whole.

**Standard 9.1 • public**      The Department has a system or systems in place to track and report direct services customers receive.

**Standard 9.2 • public**      The Department has a system or systems in place to track Family, Agency, and/or Community outcomes.

**Standard 9.3 • public**      The Department has analyzed its outcomes within the past 12 months.

**Standard 9.4 • public**      The Department submits its annual CSBG Information Survey Data Report and it reflects CSBG-funded outcomes.



**Attachment X – OCS Draft Matrix of State and Federal Performance Measures (2/27/14)**

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STATE ACCOUNTABILITY MEASURES

	FY2015: Baseline Year	FY2016	FY2017
<p><b>15. State Plan Development</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>State Plan</li> </ul>	<p><b>FY2015: Baseline Year</b></p> <p>15a. State provided opportunities for eligible entities to contribute to the development of the State Plan and provide feedback on it, including opportunities such as public comment at a public hearing. (Yes/No)</p> <p>15b. The State plan includes a State-wide vision with specific goals for meeting the intent and purpose of CSBG, and indicates how local Community Action Plans link to the vision and goals. (Yes/No)</p>	<p>15a. State provided opportunities for eligible entities to contribute to the development of the State Plan and provide feedback on it, including opportunities such as public comment at a public hearing. (Yes/No)</p> <p>15b. The State plan includes a State-wide vision with specific goals for meeting the intent and purpose of CSBG, and indicates how local Community Action Plans link to the vision and goals. (Yes/No)</p>	<p>15a. State provided opportunities for eligible entities to contribute to the development of the State Plan and provide feedback on it, including opportunities such as public comment at a public hearing. (Yes/No)</p> <p>15b. The State plan includes a State-wide vision with specific goals for meeting the intent and purpose of CSBG, and indicates how local Community Action Plans link to the vision and goals. (Yes/No)</p>
<p><b>25. Distribution of Funds</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>State Annual Report</li> <li>State Plan</li> </ul>	<p><b>FY2015: Baseline Year</b></p> <p>25a. When the State has the authority to distribute CSBG funds (i.e., it has received notification from OCS and, if applicable, authorization from the State's budget and/or legislative offices), the State CSBG agency will contract or obligate the funds to local entities within "x" days and in accordance with the lead State agency's written procedures for fund distribution and consistent with the Federal Act's intent. The number of days will be determined jointly by OCS and the State lead agency. (Yes/No)</p>	<p>25a. When the State has the authority to distribute CSBG funds (i.e., it has received notification from OCS and, if applicable, authorization from the State's budget and/or legislative offices), the State CSBG agency will contract or obligate the funds to local entities within "x" days and in accordance with the lead State agency's written procedures for fund distribution and consistent with the Federal Act's intent. The number of days will be determined jointly by OCS and the State lead agency. (Yes/No)</p>	<p>25a. When the State has the authority to distribute CSBG funds (i.e., it has received notification from OCS and, if applicable, authorization from the State's budget and/or legislative offices), the State CSBG agency will contract or obligate the funds to local entities within "x" days and in accordance with the lead State agency's written procedures for fund distribution and consistent with the Federal Act's intent. The number of days will be determined jointly by OCS and the State lead agency. (Yes/No)</p>
<p><b>35. Discretionary Funds</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>State Annual Report</li> <li>State Plan</li> </ul>	<p><b>FY2015: Baseline Year</b></p> <p>35a. State CSBG Plan includes a technical assistance strategy to guide the use of CSBG State discretionary funds. The plan is made publically available and clearly outlines how CSBG discretionary funds are allocated within the State. The report includes the % of funds used for capacity building activities (e.g., T/TA, IT, staff training, etc.); for corrective actions; for other CSBG purposes; for other purposes. (Yes/No)</p>	<p>35a. State CSBG Plan includes a technical assistance strategy to guide the use of CSBG State discretionary funds. The plan is made publically available and clearly outlines how CSBG discretionary funds are allocated within the State. The report includes the % of funds used for capacity building activities (e.g., T/TA, IT, staff training, etc.); for corrective actions; for other CSBG purposes; for other purposes. (Yes/No)</p>	<p>35a. State CSBG Plan includes a technical assistance strategy to guide the use of CSBG State discretionary funds. The plan is made publically available and clearly outlines how CSBG discretionary funds are allocated within the State. The report includes the % of funds used for capacity building activities (e.g., T/TA, IT, staff training, etc.); for corrective actions; for other CSBG purposes; for other purposes. (Yes/No)</p>

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STATE ACCOUNTABILITY MEASURES CONTINUED

MEASURE	FY2015: Baseline Year	FY2016	FY2017
<p><b>4S. Grantee Monitoring and Corrective Action</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>State Plan</li> <li>State Annual Report</li> </ul>	<p>4Sa. State agency conducts monitoring activities in accordance with State plan and as required by CSBG Statute. (Yes/No)</p> <p>4Sb. State agency staff disseminates monitoring reports to local entities in a timely manner (i.e., within 35 days or date specified in State Plan and State Policies and Procedures). (Yes/No)</p> <p>4Sc. In instances where State agency identifies findings or deficiencies through monitoring process, the State requires and receives (in accordance with time frames identified in State Policies and Procedures) a corrective action plan from local eligible entity that contains specific timelines and requirements for improvements. (Yes/No)</p> <p>4Sd. X% of local entities meeting the agreed upon schedule to resolve corrective action plans or take an appropriate course of action, based on the requirements of the CSBG Act, including reduction of funding or termination of grant eligibility for cause, if necessary. The percentage will be determined by the base year and will improve or be sustained (if at the highest level) over time.</p> <p><i>Schedules will be determined jointly by the state and local entity. The percentage will be based on the number of corrective action plans expected to be completed in a twelve-month reporting period and will improve or be sustained (if at the highest level) over time. In cases where corrective action plans are not scheduled for completion by the end of the year, the case will be tracked in the next year. In other words, if the schedule calls for corrections to be made by the next calendar year, these cases will be counted in the following year, not the current year. If corrections are not made during the year in which they are scheduled, a narrative explanation will be submitted and the case will be tracked separately until corrections are complete.</i></p> <p>4Se. X% of eligible entity A-133 Audits reviewed and closed by the State as required by OMB Circular A-133 within 30 days unless a longer period is agreed to in advance by the Federal agency.</p>	<p>4Sa. State agency conducts monitoring activities in accordance with State plan and as required by CSBG Statute. (Yes/No)</p> <p>4Sb. State agency staff disseminates monitoring reports to local entities in a timely manner (i.e., within 35 days or date specified in State Plan and State Policies and Procedures). (Yes/No)</p> <p>4Sc. In instances where State agency identifies findings or deficiencies through monitoring process, the State requires and receives (in accordance with time frames identified in State Policies and Procedures) a corrective action plan from local eligible entity that contains specific timelines and requirements for improvements. (Yes/No)</p> <p>4Sd. X% of local entities meeting the agreed upon schedule to resolve corrective action plans or take an appropriate course of action, based on the requirements of the CSBG Act, including reduction of funding or termination of grant eligibility for cause, if necessary. The percentage will be determined by the base year and will improve or be sustained (if at the highest level) over time.</p> <p><i>Schedules will be determined jointly by the state and local entity. The percentage will be based on the number of corrective action plans expected to be completed in a twelve-month reporting period and will improve or be sustained (if at the highest level) over time. In cases where corrective action plans are not scheduled for completion by the end of the year, the case will be tracked in the next year. In other words, if the schedule calls for corrections to be made by the next calendar year, these cases will be counted in the following year, not the current year. If corrections are not made during the year in which they are scheduled, a narrative explanation will be submitted and the case will be tracked separately until corrections are complete.</i></p> <p>4Se. X% of eligible entity A-133 Audits reviewed and closed by the State as required by OMB Circular A-133 within 30 days unless a longer period is agreed to in advance by the Federal agency.</p>	<p>4Sa. State agency conducts monitoring activities in accordance with State plan and as required by CSBG Statute. (Yes/No)</p> <p>4Sb. State agency staff disseminates monitoring reports to local entities in a timely manner (i.e., within 35 days or date specified in State Plan and State Policies and Procedures). (Yes/No)</p> <p>4Sc. In instances where State agency identifies findings or deficiencies through monitoring process, the State requires and receives (in accordance with time frames identified in State Policies and Procedures) a corrective action plan from local eligible entity that contains specific timelines and requirements for improvements. (Yes/No)</p> <p>4Sd. X% of local entities meeting the agreed upon schedule to resolve corrective action plans or take an appropriate course of action, based on the requirements of the CSBG Act, including reduction of funding or termination of grant eligibility for cause, if necessary. The percentage will be determined by the base year and will improve or be sustained (if at the highest level) over time.</p> <p><i>Schedules will be determined jointly by the state and local entity. The percentage will be based on the number of corrective action plans expected to be completed in a twelve-month reporting period and will improve or be sustained (if at the highest level) over time. In cases where corrective action plans are not scheduled for completion by the end of the year, the case will be tracked in the next year. In other words, if the schedule calls for corrections to be made by the next calendar year, these cases will be counted in the following year, not the current year. If corrections are not made during the year in which they are scheduled, a narrative explanation will be submitted and the case will be tracked separately until corrections are complete.</i></p> <p>4Se. X% of eligible entity A-133 Audits reviewed and closed by the State as required by OMB Circular A-133 within 30 days unless a longer period is agreed to in advance by the Federal agency.</p>

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STATE ACCOUNTABILITY MEASURES CONTINUED		FY2015: Baseline Year	FY2016	FY2017
<p><b>MEASURE</b></p> <p><b>55. Data Collection, Evaluation and Reporting</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>State Annual Reports</li> </ul>	<p>55a. State's reporting system collects quantitative data for accountability measures in accordance with CSBG Information Survey (IS) format. (Yes/No).</p> <p>55b. State agency submits IS report on time. (Yes/No)</p> <p>55c. State agency submits IS report in prescribed format that allows for aggregation across States according to the agreed upon common definitions and measures. (Yes/No)</p> <p>55d. State agency includes data collection requirement in contracts with local entities. (Yes/No)</p>	<p>55a. State's reporting system collects quantitative data for accountability measures in accordance with CSBG Information Survey (IS) format. (Yes/No).</p> <p>55b. State agency submits IS report on time. (Yes/No)</p> <p>55c. State agency submits IS report in prescribed format that allows for aggregation across States according to the agreed upon common definitions and measures. (Yes/No)</p> <p>55d. State agency includes data collection requirement in contracts with local entities. (Yes/No)</p> <p>55e. State agency reporting process incorporates the review of the quality of the data submitted by the local entity to ensure that reporting is complete and standard measures and definitions have been used consistently. The objective is to have data collection and review take place frequently enough to promote timely review and adjustment of activities/resource allocation. The initial data collection and review will be done on a semi-annual basis, with the objective of moving toward a quarterly review for a sub-set of measures that will be determined in consultation with the CSBG Network.</p> <p>55f. State agency provides semi-annual (later quarterly) feedback to local entities regarding review of planned versus actual performance as assessed through local data. (Yes/No)</p> <p>55g. On a semi-annual basis (later quarterly), the State agency provides feedback to DSA regarding the progress being made by the local entities for a subset of measures based on the performance data collected. For the feedback, State agencies might compare local entity performance over time.</p>	<p>55a. State's reporting system collects quantitative data for accountability measures in accordance with CSBG Information Survey (IS) format. (Yes/No).</p> <p>55b. State agency submits IS report on time. (Yes/No)</p> <p>55c. State agency submits IS report in prescribed format that allows for aggregation across States according to the agreed upon common definitions and measures. (Yes/No)</p> <p>55d. State agency includes data collection requirement in contracts with local entities. (Yes/No)</p> <p>55e. State agency reporting process incorporates the review of the quality of the data submitted by the local entity to ensure that reporting is complete and standard measures and definitions have been used consistently. The objective is to have data collection and review take place frequently enough to promote timely review and adjustment of activities/resource allocation. The initial data collection and review will be done on a semi-annual basis, with the objective of moving toward a quarterly review for a sub-set of measures that will be determined in consultation with the CSBG Network.</p> <p>55f. State agency provides semi-annual (later quarterly) feedback to local entities regarding review of planned versus actual performance as assessed through local data. (Yes/No)</p> <p>55g. On a semi-annual basis (later quarterly), the State agency provides feedback to DSA regarding the progress being made by the local entities for a subset of measures based on the performance data collected. For the feedback, State agencies might compare local entity performance over time.</p>	

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STATE ACCOUNTABILITY MEASURES CONTINUED		FY2015: Baseline Year		FY2016		FY2017	
MEASURE							
6S Organizational Standards		6Sa. The State developed implementation framework for organizational standards in cooperation with Eligible Entities and the CAA State Association (Yes/No)	6Sa. The State developed implementation framework for organizational standards in cooperation with Eligible Entities and the CAA State Association (Yes/No)	6Sa. The State developed implementation framework for organizational standards in cooperation with Eligible Entities and the CAA State Association (Yes/No)	6Sa. The State developed implementation framework for organizational standards in cooperation with Eligible Entities and the CAA State Association (Yes/No)		
Data Source:		6Sb. Organizational standards and the expectation to meet 100% of these Standards are included in the State Plan (Yes/No)	6Sb. Organizational standards and the expectation to meet 100% of these Standards are included in the State Plan (Yes/No)	6Sb. Organizational standards and the expectation to meet 100% of these Standards are included in the State Plan (Yes/No)	6Sb. Organizational standards and the expectation to meet 100% of these Standards are included in the State Plan (Yes/No)		
State Plan		6Sc. Organizational standards and the expectation to meet 100% of these Standards are included in State contracts with eligible entities. (Yes/No)	6Sc. Organizational standards and the expectation to meet 100% of these Standards are included in State contracts with eligible entities. (Yes/No)	6Sc. Organizational standards and the expectation to meet 100% of these Standards are included in State contracts with eligible entities. (Yes/No)	6Sc. Organizational standards and the expectation to meet 100% of these Standards are included in State contracts with eligible entities. (Yes/No)		
State Annual Report		6Sd. The State Plan includes identification of necessary T/TA to enable Eligible Entities to meet organizational standards (Yes/No)	6Sd. The State Plan includes identification of necessary T/TA to enable Eligible Entities to meet organizational standards (Yes/No)	6Sd. The State Plan includes identification of necessary T/TA to enable Eligible Entities to meet organizational standards (Yes/No)	6Sd. The State Plan includes identification of necessary T/TA to enable Eligible Entities to meet organizational standards (Yes/No)		
		6Se. The State measures and reports the number of Eligible Entities that meet the following percentage of organizational standards:	6Se. The State measures and reports the number of Eligible Entities that meet the following percentage of organizational standards:	6Se. The State measures and reports the number of Eligible Entities that meet the following percentage of organizational standards:	6Se. The State measures and reports the number of Eligible Entities that meet the following percentage of organizational standards:		
		<ul style="list-style-type: none"> <li>• 100%</li> <li>• 90%-99%</li> <li>• 75%-89%</li> <li>• 50%-74%</li> <li>• Less than 50%</li> </ul>	<ul style="list-style-type: none"> <li>• 100%</li> <li>• 90%-99%</li> <li>• 75%-89%</li> <li>• 50%-74%</li> <li>• Less than 50%</li> </ul>	<ul style="list-style-type: none"> <li>• 100%</li> <li>• 90%-99%</li> <li>• 75%-89%</li> <li>• 50%-74%</li> <li>• Less than 50%</li> </ul>	<ul style="list-style-type: none"> <li>• 100%</li> <li>• 90%-99%</li> <li>• 75%-89%</li> <li>• 50%-74%</li> <li>• Less than 50%</li> </ul>		
		6Sf. The State has in place corrective action plans for all Eligible Entities meeting less than 90% of organizational standards (Yes/No)	6Sf. The State has in place corrective action plans for all Eligible Entities meeting less than 90% of organizational standards (Yes/No)	6Sf. The State has in place corrective action plans for all Eligible Entities meeting less than 90% of organizational standards (Yes/No)	6Sf. The State has in place corrective action plans for all Eligible Entities meeting less than 100% of organizational standards (Yes/No) [NOTE: By FY2017, all Eligible Entities are expected to meet all organizational standards.]		

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STATE ACCOUNTABILITY MEASURES CONTINUED		FY2015: Baseline Year	FY2016	FY2017
<p><b>MEASURE</b></p> <p><b>7S. Training and Technical Assistance</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>State Plan</li> </ul>	<p>7Sa. The State has a Strategic Plan for T/TA that is publicly available. (Yes/No)</p> <p>7Sb. The State has a Strategic Plan for T/TA that includes consultation with the Eligible Entities and CAA State Association regarding potential T/TA needs (Yes/No)</p> <p>7Sc. The State has included plans for T/TA in the State Plan submitted to OCS that includes T/TA on organizational standards, as needed (Yes/No)</p> <p>7Sd. The State provides training to State CSBG Monitoring Staff to increase their ability to provide T/TA (Yes/No)</p> <p>7Se. The State provides training to eligible entities on organizational standards (Yes/No)</p>	<p>7Sa. The State has a Strategic Plan for T/TA that is publicly available. (Yes/No)</p> <p>7Sb. The State has a Strategic Plan for T/TA that includes consultation with the Eligible Entities and CAA State Association regarding potential T/TA needs. (Yes/No)</p> <p>7Sc. The State has included plans for T/TA in the State Plan submitted to OCS that includes T/TA on organizational standards, as needed (Yes/No)</p> <p>7Sd. The State provides training to State CSBG Monitoring Staff to increase their ability to provide T/TA (Yes/No)</p> <p>7Se. The State provides training to eligible entities on organizational standards (Yes/No)</p> <p>7Sf. The State provides T/TA in organizational standards areas that are met by fewer than 30% of the eligible entities (Yes/No)</p>	<p>7Sa. The State has a Strategic Plan for T/TA that is publicly available. (Yes/No)</p> <p>7Sb. The State has a Strategic Plan for T/TA that includes consultation with the Eligible Entities and CAA State Association regarding potential T/TA needs (Yes/No)</p> <p>7Sc. The State has included plans for T/TA in the State Plan submitted to OCS that includes T/TA on organizational standards, as needed (Yes/No)</p> <p>7Sd. The State provides training to State CSBG Monitoring Staff to increase their ability to provide T/TA (Yes/No)</p> <p>7Se. The State provides training to eligible entities on organizational standards (Yes/No)</p> <p>7Sf. The State provides T/TA in organizational standards areas that are met by fewer than 20% of the eligible entities (Yes/No) [NOTE: FY2017 has a lower threshold (20%) than FY2016 (30%).]</p>	

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STATE ACCOUNTABILITY MEASURES CONTINUED	
MEASURE	FY2015: Baseline Year
<p><b>8S. Communications</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>State Annual Report</li> </ul>	<p>FY2016</p> <p>8Sa. The State demonstrates communication to Eligible Entities through various mechanisms:</p> <ul style="list-style-type: none"> <li>Newsletters, blogs, or other forms of mass communication (Yes/No)</li> <li>Advisory group meetings (Yes/No)</li> <li>Meetings with State CAA Associations (Yes/No)</li> <li>Annual Reports (Yes/No)</li> <li>Information Memorandum or other formal Guidance Documents (Yes/No)</li> </ul> <p>The goal is to have at least two different forms of communication on a quarterly basis.</p>
<p><b>MEASURE</b></p> <p><b>9S. Community Engagement</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>State Annual Report (narrative)</li> <li>IS</li> </ul>	<p>FY2015: Baseline Year</p> <p>FY2016</p> <p>9Sa. State agency describes the impact of existing partnerships and collaborations between State (government) agencies and the private sector (either nonprofit or for-profit entities) established to assist CSBG target population. (Yes/No)</p> <p>Partnerships are considered to be mutually beneficial arrangements wherein each entity contributes and/or receives: time, effort, expertise and/or resources. These could be documented through MOUs, contracts, agreements, documented outcomes, etc. This does not require that all partnerships are documented.</p> <p>9Sb. The State Plan provides examples of how the State coordinated linkages across related social services programs within their State to maintain or improve effective delivery of services to low-income people (assurances) as measured by the number of State programs that are linked or other measure of effectiveness. (Yes/No)</p> <p>9Sc. State agency reports the number of established linkages between governmental and other social services programs.</p> <p>Linkages encompass strategies and activities developed to fill identified gaps in social services through coordinated planning, data and information sharing protocols, referral of clients among social service providers to create a comprehensive service package, or participation in coalitions and alliances that support CSBG anti-poverty goals and initiatives</p>

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FEDERAL ACCOUNTABILITY MEASURES

		FY2015: Baseline Year	FY2016	FY2017
<p><b>MEASURE</b></p> <p><b>1F. State Plan Review and Acceptance</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>State Plan</li> <li>OCS Internal Procedures</li> </ul>	<p><b>FY2015: Baseline Year</b></p> <p>1Fa. Number of State Plans reviewed and accepted within 60 business days of receipt of the complete State Plan.</p> <p><i>If less than 100%, the next year's goal should be an increase until 100% is reached (and maintained). In the event the State Plan is incomplete a full response and information request will be provided to the State within this timeframe and a Plan will be accepted within 15 days after receipt of needed information.</i></p>	<p><b>FY2016</b></p> <p>1Fa. Number of State Plans reviewed and accepted within 60 business days of receipt of the complete State Plan.</p> <p><i>If less than 100%, the next year's goal should be an increase until 100% is reached (and maintained). In the event the State Plan is incomplete a full response and information request will be provided to the State within this timeframe and a Plan will be accepted within 15 days after receipt of needed information.</i></p>	<p><b>FY2017</b></p> <p>1Fa. Number of State Plans reviewed and accepted within 60 business days of receipt of the complete State Plan.</p> <p><i>If less than 100%, the next year's goal should be an increase until 100% is reached (and maintained). In the event the State Plan is incomplete a full response and information request will be provided to the State within this timeframe and a Plan will be accepted within 15 days after receipt of needed information.</i></p>	
<p><b>MEASURE</b></p> <p><b>2F. Distribution of Funds</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>OCS Internal Procedures</li> </ul>	<p><b>FY2015: Baseline Year</b></p> <p>2Fa. ACF distributes CSBG funds to State, Tribes, and Territories within 15 business days of OMB and Department appointment of funds and acceptance of State Plan. Measure will be the number of States for which this is true, and the goal should be all jurisdictions.</p>	<p><b>FY2016</b></p> <p>2Fa. ACF distributes CSBG funds to State, Tribes, and Territories within 15 business days of OMB and Department appointment of funds and acceptance of State Plan. Measure will be the number of States for which this is true, and the goal should be all jurisdictions.</p>	<p><b>FY2017</b></p> <p>2Fa. ACF distributes CSBG funds to State, Tribes, and Territories within 15 business days of OMB and Department appointment of funds and acceptance of State Plan. Measure will be the number of States for which this is true, and the goal should be all jurisdictions.</p>	
<p><b>MEASURE</b></p> <p><b>3F. Grant Monitoring and Corrective Action</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>State Annual Report</li> <li>OCS Internal Procedures</li> </ul>	<p><b>FY2015: Baseline Year</b></p> <p>3Fa. X% of draft State Assessment Reports sent within 60 calendar days of State Assessment site visit.</p> <p><i>The percentage will be determined by the base year and will improve or be sustained (if at the highest level) over time.</i></p> <p>3Fb X% of State Corrective Action Plans accepted by OCS within 30 days from State submission.</p> <p>3Fc. X% of States meeting the agreed upon schedule to resolve corrective action plans required by OCS as a result of State Assessments.</p> <p><i>The percentage will be based on the number of corrective action plans to be completed each Federal Fiscal Year. The percentage will be determined at the end of FY2015 and will improve or be sustained (if at the highest level) over time.</i></p> <p>3Fd. X% of States that have repeat audit findings. The percentage will be determined at the end of FY2015 and will decrease over time until it reaches zero.</p>	<p><b>FY2016</b></p> <p>3Fa. X% of draft State Assessment Reports sent within 60 calendar days of State Assessment site visit.</p> <p><i>The percentage will be determined by the base year and will improve or be sustained (if at the highest level) over time.</i></p> <p>3Fb X% of State Corrective Action Plans accepted by OCS within 30 days from State submission.</p> <p>3Fc. X% of States meeting the agreed upon schedule to resolve corrective action plans required by OCS as a result of State Assessments.</p> <p><i>The percentage will be based on the number of corrective action plans to be completed each Federal Fiscal Year. The percentage will be determined at the end of FY2015 and will improve or be sustained (if at the highest level) over time.</i></p> <p>3Fd. X% of States that have repeat audit findings. The percentage will be determined at the end of FY2015 and will decrease over time until it reaches zero.</p>	<p><b>FY2017</b></p> <p>3Fa. X% of draft State Assessment Reports sent within 60 calendar days of State Assessment site visit.</p> <p><i>The percentage will be determined by the base year and will improve or be sustained (if at the highest level) over time.</i></p> <p>3Fb X% of State Corrective Action Plans accepted by OCS within 30 days from State submission.</p> <p>3Fc. X% of States meeting the agreed upon schedule to resolve corrective action plans required by OCS as a result of State Assessments.</p> <p><i>The percentage will be based on the number of corrective action plans to be completed each Federal Fiscal Year. . The percentage will be determined at the end of FY2015 and will improve or be sustained (if at the highest level) over time.</i></p> <p>3Fd. X% of States that have repeat audit findings. The percentage will be determined at the end of FY2015 and will decrease over time until it reaches zero.</p>	

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FEDERAL ACCOUNTABILITY MEASURES CONTINUED		FY2015 Baseline Year	FY2016	FY2017
<p><b>MEASURE</b></p> <p>4F. Data Collection, Evaluation and Reporting</p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>• OCS Internal Procedures</li> </ul>	<p>4Fa. DSA receives State accountability data updates on a small subset of measures on a semi-annual basis (later quarterly). Performance data updates will focus on progress toward performance management goals. DSA provides timely feedback to the States based on performance data/information received.</p>	<p>4Fa. DSA receives State accountability data updates on a small subset of measures on a semi-annual basis (later quarterly). Performance data updates will focus on progress toward performance management goals. DSA provides timely feedback to the States based on performance data/information received.</p>	<p>4Fa. DSA receives State accountability data updates on a small subset of measures on a semi-annual basis (later quarterly). Performance data updates will focus on progress toward performance management goals. DSA provides timely feedback to the States based on performance data/information received.</p>	<p>4Fa. DSA receives State accountability data updates on a small subset of measures on a semi-annual basis (later quarterly). Performance data updates will focus on progress toward performance management goals. DSA provides timely feedback to the States based on performance data/information received.</p>
<p><b>MEASURE</b></p> <p>5F. Organizational Standards</p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>• State Plan</li> <li>• State Annual Report</li> </ul>	<p><b>FY2015: Baseline Year</b></p> <p>5Fa. Number of States in which X% of local eligible entities meet or exceed 90% of organization standards.</p> <p><i>The targeted percentage would increase over time. The first year would determine the baseline. Example: 40 States in which 80% of local eligible entities met or exceeded 90% of organizational standards.</i></p> <p>5Fb. Number of States that have developed an implementation framework for the organizational standards in cooperation with Eligible Entities and the CAA State Association</p> <p>5Fc. Number of States that include organizational standards and the expectation to meet 100% of these standards in their State Plan</p> <p>5Fd. Number of States that include organizational standards and the expectation to meet 100% of these Standards in State contracts with eligible entities</p> <p>5Fe. Number of States that include T/TA related to organizational standards in their State Plan</p>	<p>5Fa. Number of States in which X% of local eligible entities meet or exceed 90% of organization standards.</p> <p><i>The targeted percentage would increase over time. The first year would determine the baseline. Example: 40 States in which 80% of local eligible entities met or exceeded 90% of organizational standards.</i></p> <p>5Fb. Number of States that have developed an implementation framework for the organizational standards in cooperation with Eligible Entities and the CAA State Association</p> <p>5Fc. Number of States that include organizational standards and the expectation to meet 100% of these Standards in their State Plan</p> <p>5Fd. Number of States that include organizational standards and the expectation to meet 100% of these Standards in State contracts with eligible entities</p> <p>5Fe. Number of States that include T/TA related to organizational standards in their State Plan</p> <p>5Ff. X% of States with Eligible Entities that improved or sustained (if at the highest level) their level of organizational standards compared with the previous year. The percentage will be determined at the end of FY2015 and will improve or be sustained (if at the highest level) over time.</p> <p>5Fg. Number of States that do not have Corrective Action plans in place for CAAs meeting fewer than 90% of the organizational standards</p>	<p>5Fa. Number of States in which X% of local eligible entities meet or exceed 90% of organization standards.</p> <p><i>The targeted percentage would increase over time. The first year would determine the baseline. Example: 40 States in which 80% of local eligible entities met or exceeded 90% of organizational standard.</i></p> <p>5Fb. Number of States that have developed an implementation framework for the organizational standards in cooperation with Eligible Entities and the CAA State Association</p> <p>5Fc. Number of States that include organizational standards and the expectation to meet 100% of these standards in their State Plan</p> <p>5Fd. Number of States that include organizational standards and the expectation to meet 100% of these Standards in State contracts with eligible entities</p> <p>5Fe. Number of States that include T/TA related to organizational standards in their State Plan</p> <p>5Ff. X% of States with Eligible Entities that improved or sustained (if at the highest level) their level of organizational standards compared with the previous year. The percentage will be determined at the end of FY2015 and will improve or be sustained (if at the highest level) over time.</p> <p>5Fg. Number of States that do not have Corrective Action plans in place for CAAs meeting fewer than 90% of the organizational standards</p>	<p>5Fa. Number of States in which X% of local eligible entities meet or exceed 90% of organization standards.</p> <p><i>The targeted percentage would increase over time. The first year would determine the baseline. Example: 40 States in which 80% of local eligible entities met or exceeded 90% of organizational standard.</i></p> <p>5Fb. Number of States that have developed an implementation framework for the organizational standards in cooperation with Eligible Entities and the CAA State Association</p> <p>5Fc. Number of States that include organizational standards and the expectation to meet 100% of these standards in their State Plan</p> <p>5Fd. Number of States that include organizational standards and the expectation to meet 100% of these Standards in State contracts with eligible entities</p> <p>5Fe. Number of States that include T/TA related to organizational standards in their State Plan</p> <p>5Ff. X% of States with Eligible Entities that improved or sustained (if at the highest level) their level of organizational standards compared with the previous year. The percentage will be determined at the end of FY2015 and will improve or be sustained (if at the highest level) over time.</p> <p>5Fg. Number of States that do not have Corrective Action plans in place for CAAs meeting fewer than 90% of the organizational standards</p>

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FEDERAL ACCOUNTABILITY MEASURES CONTINUED	
MEASURE	FY2015: Baseline Year
<p><b>6F. Training and Technical Assistance</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>OCS Internal Procedures</li> </ul>	<p>FY2015: Baseline Year</p> <p>6Fa. OCS has a Strategic Plan for T/TA that includes consultation with eligible entities, State CSBG agencies and CAA State Associations regarding potential T/TA needs (Yes/No)</p> <p>6Fb. OCS funds priorities outlined in the T/TA Strategic Plan (Yes/No)</p> <p>6Fc. OCS funds the State Association to provide T/TA (Yes/No)</p> <p>6Fd. OCS provides or supports training to at least 50% of State CSBG Offices on roles/responsibilities and organizational standards. (Yes/No)</p> <p>6Fe. Number of States providing or funding T/TA on organizational standards</p>
	<p>FY2016</p> <p>6Fa. OCS has a Strategic Plan for T/TA that includes consultation with eligible entities, State CSBG agencies and CAA State Associations regarding potential T/TA needs (Yes/No)</p> <p>6Fb. OCS funds priorities outlined in the T/TA Strategic Plan (Yes/No)</p> <p>6Fc. OCS funds the State Association to provide T/TA (Yes/No)</p> <p>6Fd. OCS provides or supports trainings to 75% of State CSBG Offices on roles/responsibilities and organizational standards (Yes/No) [NOTE: FY2016 has a higher percentage (75%) than FY2015 (50%).]</p> <p>6Fe. At least 75% of States provide or fund T/TA on organizational standards</p>
	<p>FY2017</p> <p>6Fa. OCS has a Strategic Plan for T/TA that includes consultation with eligible entities, State CSBG agencies and CAA State Associations regarding potential T/TA needs (Yes/No)</p> <p>6Fb. OCS funds priorities outlined in the T/TA Strategic Plan (Yes/No)</p> <p>6Fc. OCS funds the State Association to provide T/TA (Yes/No)</p> <p>6Fd. OCS provides or supports trainings to 95% of State CSBG Offices on roles/responsibilities and organizational standards (Yes/No) [NOTE: FY2017 has a higher percentage (95%) than FY2016 (75%).]</p> <p>6Fe. At least 90% of States provide or fund T/TA on organizational standards [NOTE: FY2017 has a higher percentage (90%) than FY2016 (75%).]</p>
<p><b>7F. Communications</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>OCS Internal Procedures</li> </ul>	<p>FY2015: Baseline Year</p> <p>7Fa. OCS demonstrates communication to States and Eligible Entities through various mechanisms:</p> <ul style="list-style-type: none"> <li>Newsletters, blogs, or other forms of mass communication (Yes/No)</li> <li>Advisory group meetings (Yes/No)</li> <li>Meetings with State CAA Associations (Yes/No)</li> <li>Annual Reports (Yes/No)</li> <li>Information Memorandum or other formal Guidance Documents (Yes/No)</li> </ul> <p>The goal is to have at least two different forms of communication on a quarterly basis.</p>
	<p>FY2016</p> <p>7Fa. OCS demonstrates communication to States and Eligible Entities through various mechanisms:</p> <ul style="list-style-type: none"> <li>Newsletters, blogs, or other forms of mass communication (Yes/No)</li> <li>Advisory group meetings (Yes/No)</li> <li>Meetings with State CAA Associations (Yes/No)</li> <li>Annual Reports (Yes/No)</li> <li>Information Memorandum or other formal Guidance Documents (Yes/No)</li> </ul> <p>The goal is to have at least two different forms of communication on a quarterly basis.</p>
	<p>FY2017</p> <p>7Fa. OCS demonstrates communication to States and Eligible Entities through various mechanisms:</p> <ul style="list-style-type: none"> <li>Newsletters, blogs, or other forms of mass communication (Yes/No)</li> <li>Advisory group meetings (Yes/No)</li> <li>Meetings with State CAA Associations (Yes/No)</li> <li>Annual Reports (Yes/No)</li> <li>Information Memorandum or other formal Guidance Documents (Yes/No)</li> </ul> <p>The goal is to have at least two different forms of communication on a quarterly basis.</p>
<p><b>8F. Partnerships and Collaborations</b></p> <p>Data Sources:</p> <ul style="list-style-type: none"> <li>OCS Internal Procedures</li> </ul>	<p>FY2015: Baseline Year</p> <p>8Fa. Partnerships and collaborations as measured by:</p> <ul style="list-style-type: none"> <li>The number of DSA webinars involving other Federal agencies and/or private sector organizations. The baseline will be set annually by an internal DSA Directive and should improve or be sustained (if at the highest level) over time.</li> <li>The number of conferences sponsored by other Federal agencies and/or private sector organizations where DSA has an active role (e.g. presentations, workshops). The baseline will be set annually by an internal DSA Directive and should improve or be sustained (if at the highest level) over time.</li> </ul>
	<p>FY2016</p> <p>8Fa. Partnerships and collaborations as measured by:</p> <ul style="list-style-type: none"> <li>The number of DSA webinars involving other Federal agencies and/or private sector organizations. The baseline will be set annually by an internal DSA Directive and should improve or be sustained (if at the highest level) over time.</li> <li>The number of conferences sponsored by other Federal agencies and/or private sector organizations where DSA has an active role (e.g. presentations, workshops). The baseline will be set annually by an internal DSA Directive and should improve or be sustained (if at the highest level) over time.</li> </ul>
	<p>FY2017</p> <p>8Fa. Partnerships and collaborations as measured by:</p> <ul style="list-style-type: none"> <li>The number of DSA webinars involving other Federal agencies and/or private sector organizations. The baseline will be set annually by an internal DSA Directive and should improve or be sustained (if at the highest level) over time.</li> <li>The number of conferences sponsored by other Federal agencies and/or private sector organizations where DSA has an active role (e.g. presentations, workshops). The baseline will be set annually by an internal DSA Directive and should improve or be sustained (if at the highest level) over time.</li> </ul>

**Attachment XI – State Association Sample Schedule for T/TA and Follow-up with CAAs**

Community Action Partnership of U									
Tentative T/TA Calendar FY2015*									
CSBG Entities Organizational Stanc									
<b>FY2014 Q4</b>	<b>Jul - Sep</b>								
July	State Association Meeting Topic: Risk Assessme Agency Consultations*								
August	Statewide Training: ROMA/Logic Model Work Ses Agency Consultations								
September	State Association Meeting Topic: Strategic Plann Statewide Training: DBA Database Training Agency Consultations								
<b>FY2015 Q1</b>	<b>Oct - Dec</b>								
October	Statewide Training: IS Report Training - NASCSP Agency Consultations								
November	State Association Meeting Topic: Board Govern Agency Consultations								
December	Agency Consultations								
<b>FY2015 Q2</b>	<b>Jan - Mar</b>								
January	State Association Meeting Topic: Statewide Prog Agency Consultations								
February	Statewide Training: ROMA Full-Day Training Agency Consultations								
March	State Association Meeting Topic: Needs Assessm Agency Consultations								
<b>FY2015 Q3</b>	<b>Apr - Jun</b>								
April	Agency Consultations								
May	State Association Meeting Topic: Data Collectio Agency Consultations Annual Conference: Workshop Topics on Standa								
June	Agency Consultations								
<b>FY2015 Q4</b>	<b>Jul - Sep</b>								

July	State Association Meeting Topic: Statewide Prog Agency Consultations				
August	Agency Consultations				
September	State Association Meeting Topic: TBD as determi Agency Consultations				

\*Note - this is a tentative calendar that is subject to change without notice and is intended for informational purposes only.

\*\*Note - agency consultations are hour-long informal meetings between the State Association and individual CAAs that are focused on areas of noncompliance. Topics vary by agency and are subject to change without notice. Meetings are used for problem solving, identifying & requesting additional resources, and formulating action plans for achieving compliance around specific standards.

Community Action Partnership of Utah									
Tentative Agency Consultation Calendar FY2014-20:									
CSBG Entities Organizational Standards Implementa									
<b>FY2014 Q4</b>	<b>Agency</b>	<b>Consultation Topic</b>							
July	BRAG	Strategic Planning (6.1 - 6.5)							
	OWCAP	Needs Assessment & Community Engagemen							
	FCC	Data Collection & Needs Assessment (1.1, 1.3							
	SLCAP	Data Collection & Needs Assessment (1.3, 9.3							
	CASFB	Board Governance (3.4, 5.9, 6.5, 8.7, 8.10)							
	UBAOG	ROMA & Board Governance (4.1, 4.1)							
	SEUALG	Board Governance (5.1 - 5.9, 8.3, 8.4, 8.7, 8.9							
	6AOG	Data Collection & Board Governance (1.3)							
	5AOG	Board Governance (6.5, 8.7)							
August	BRAG	Strategic Planning & Needs Assessment (6.1 -							
	OWCAP	ROMA & Board Governance (4.1)							
	FCC	Needs Assessment & Board Governance (3.4)							
	SLCAP	Succession Planning (4.4)							
	CASFB	Risk Assessment (4.5)							
	UBAOG	Board Governance (5.6, 5.7, 6.5)							
	SEUALG	Board Governance (5.1 - 5.9, 8.3, 8.4, 8.7, 8.9							
	6AOG	Community Engagement & Data Collection (2							
	5AOG	TBD by Agency CSBG Staff & State Associatio							
September	BRAG	Board Governance & ROMA (4.1, 5.6, 6.5)							
	OWCAP	Succession Planning (4.4)							
	FCC	Risk Assessment (4.5)							
	SLCAP	Risk Assessment (4.5)							
	CASFB	TBD by Agency CSBG Staff & State Associatio							
	UBAOG	Strategic Planning (6.1 - 6.5)							
	SEUALG	Board Governance (5.1 - 5.9, 8.3, 8.4, 8.7, 8.9							
	6AOG	ROMA & Needs Assessment (4.2)							
	5AOG	TBD by Agency CSBG Staff & State Associatio							
<b>FY2015 Q1</b>	<b>Oct - Dec</b>								
October	BRAG	Board Governance & Human Resources (7.7)							
	OWCAP	Risk Assessment (4.5)							
	FCC	Strategic Planning & ROMA (4.3, 6.2 - 6.5)							
	SLCAP	Strategic Planning (6.1, 6.5)							
	CASFB	TBD by Agency CSBG Staff & State Associatio							
	UBAOG	Strategic Planning (6.1 - 6.5)							
	SEUALG	Strategic Planning (6.1 - 6.5)							
	6AOG	Strategic Planning (6.1 - 6.5)							
	5AOG	TBD by Agency CSBG Staff & State Associatio							
November	BRAG	Board Governance & Human Resources (7.7)							
	OWCAP	Human Resources (7.1)							

	FCC	Data Collection & Analysis (9.3)			
	SLCAP	Board Governance (5.4)			
	CASFB	TBD by Agency CSBG Staff & State Associatio			
	UBAOG	Human Resources (7.5, 7.7)			
	SEUALG	ROMA & Strategic Planning (4.3, 6.1 - 6.5)			
	6AOG	Risk Assessment & Board Governance (4.5, 5			
	5AOG	TBD by Agency CSBG Staff & State Associatio			
December	BRAG	TBD by Agency CSBG Staff & State Associatio			
	OWCAP	Board Governance & Fiscal Policies (8.6, 8.7, 8			
	FCC	Human Resources & Fiscal Policies (7.3, 7.9, 8			
	SLCAP	Human Resources (7.3, 7.9)			
	CASFB	TBD by Agency CSBG Staff & State Associatio			
	UBAOG	TBD by Agency CSBG Staff & State Associatio			
	SEUALG	Data Collection & Board Governance (1.1, 1.3			
	6AOG	Human Resources & Board Governance (7.7, 7			
	5AOG	TBD by Agency CSBG Staff & State Associatio			
FY2015 Q2	Jan - Mar	Agency Consultation Topics TBD			
FY2015 Q3	Apr - Jun	Agency Consultation Topics TBD			
FY2015 Q4	Jul - Aug	Agency Consultation Topics TBD			

\*Note - this is a tentative calendar that is subject to change without notice and is intended for informational purposes only.

\*\*Note - need for T/TA will vary by agency. The state association intends to be flexible in targeting efforts to ensure maximum efficiency of discretionary funds.